# EXHIBIT "6"

### EXHIBIT 6 (pt. 1)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT NEW YORK

	X	
DEBORAH D. PETERSON, Personal Representative of the Estate of James C. Knipple (Dec.), et al., Plaintiffs,	: : : : : : : : : : : : : : : : : : : :	Case No. 10 Civ. 4518 (LAP) CONSOLIDATED
V.	:	
ISLAMIC REPUBLIC OF IRAN, BANK MARKAZI a/k/a CENTRAL BANK OF IRAN BANCA UBAE SpA; CITIBANK, N.A.; and CLEARSTREAM BANKING, S.A.  Defendants.	;;;	
	: x	

#### **DECLARATION**

- I, Alan H. Katz, declare as follows:
- 1. I am Of Counsel to Locke Lord LLP, attorneys for Successor Trustee Kenneth G. Feinberg (the "Trustee"). This declaration concerns the assignment of Delayed Distributions to Lead Attorneys and Designated Distribution Agents.
- 2. Pursuant to the terms of the Court's Order entered on February 28, 2020 (the "Distribution Approval Order"), the Trustee determined that all or portions of Supplemental Distributions, Pre-Final Distributions and/or Final Distributions of the Plaintiffs assigned the following tracking numbers were Delayed Distributions that should be assigned to Lead Attorneys or Designated Distribution Agents:

TN 316	TN 763	TN 1120	TN 1520
TN 343	TN 839	TN 1308	TN 1532
TN 359	TN 925	TN 1363	TN 1693
TN 362	TN 996	TN 1397	TN 1728
TN 424	TN 1061	TN 1486	
TN 592	TN 1107	TN 1491	

3. Assignments to Lead Attorneys for the Plaintiffs identified above were accomplished by sending to such Lead Attorneys, by courier, the letters attached hereto as Exhibits A and B-1. The letters enclosed schedules detailing the amounts assigned

with regard to each Plaintiff, the Lead Attorney to whom each individual assignment was being made, the name of each Plaintiff, the principal reasons why the Trustee had determined each Plaintiff's distributions to be Delayed Distributions and the allocation of each assigned Delayed Distribution that the Trustee had anticipated making had the issues delaying distribution been resolved in a timely manner. The letters also enclosed checks payable to each Lead Attorney in the amounts being assigned to such Lead Attorney. The Plaintiffs' names and the Trustee's checking account number have been redacted from the schedules and checks in Exhibits A and B-1.

- 4. After sending the letter attached hereto as Exhibit B-1, the Trustee discovered that, with regard to several Plaintiffs identified in Exhibit B-1, the information in the schedule concerning the Trustee's anticipated distribution of attorneys' fees contained a misallocation of approximately \$6,000 of attorneys' fees. The misallocation did not affect the total amounts of attorneys' fees or the amounts payable to Plaintiffs themselves. Further, it is the obligation of the Lead Attorneys to properly distribute the Delayed Distributions assigned to them. Nevertheless, the Trustee prepared a corrected schedule and sent it to the Lead Attorneys for such Plaintiffs and the attorneys who may have been affected by the misallocation, who agreed to substitute the corrected schedule for the one originally included with Exhibit B-1. The corrected schedule is attached hereto as Exhibit B-2.
- 5. The amounts assigned to Lead Attorneys for the following Plaintiffs, all of which are estates, consisted only of attorneys' fees. Such Plaintiffs' Delayed Distributions also included amounts payable to the Plaintiffs, but for the issues delaying distribution. The Trustee chose to assign the amounts payable to the Plaintiffs to such Plaintiffs' Designated Distribution Agents, who also serve as such Plaintiffs' estate counsel and agreed to properly handle the amounts assigned to them. Following are the tracking numbers for such Plaintiffs and the names of the Designated Distribution Agents/estate counsel to whom the Plaintiffs' portions were assigned:

TN 343 Leah Shedlo
TN 424 Leah Shedlo
TN 1363 Kevin P. Connolly
TN 1397 Leah Shedlo

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 24, 2021



# **EXHIBIT A**

Brookfield Place, 200 Vesey Street 20th Floor New York, NY 10281-2101

Telephone: 212-415-8600 Fax: 212-303-2754 www.lockelord.com

Alan H. Katz

akatz@lockelord.com

Direct Telephone: 212-415-8509 Direct Fax: 212-812-8380

February 18, 2021

By E-Mail and FedEx:

Dale K. Cathell Virginia Callahan DLA Piper LLP (US) The Marbury Building 6225 Smith Avenue Baltimore, Maryland 21209-3600

Re: Peterson Fund – Assignment of Distributions

Dear Counsel:

As you know, we represent Kenneth R. Feinberg, Successor Trustee (the "Trustee") of the Peterson §468B Qualified Settlement Fund (the "Fund"). As described in the motion (ECF No. 1059, the "Motion") filed by the Trustee on January 22, 2020 in Peterson, et al. v. Islamic Republic of Iran, et al., Case No. 10-4518, U.S. District Court for the Southern District of New York (the "Peterson Case"), the Trustee has been making Pre-Final and Final Distributions and associated attorneys' fees.

Pursuant to an order (ECF No. 1070, the "Order") entered by the District Court, where the Trustee determines that one or more issues exist that may delay the Trustee's ability to timely remit payment of one or more of the distributions, the Trustee is authorized, among other things, to transfer and assign such distributions, which may include attorneys' fees and/or amounts owed to advance or funding companies, to a distribution agent designated by the relevant Plaintiff (a "Designated Distribution Agent") or to the lead attorney authorized to represent such Plaintiff in connection with the Peterson Case (the "Lead Litigation Attorney"), to be held in trust pending resolution of such issues.

The Order further provides that: (a) once such distributions have been transferred as provided in the Order, the Fund and the Trustee shall have no further liability for, or responsibility regarding, such distributions and (b) the transfer of such distributions to a Designated Distribution Agent or Lead Litigation Attorney shall not modify, limit or impair the rights of any Plaintiff, estate, attorney, advance company or other funding company, lender or other person or entity with respect to such distributions. Accordingly, a Designated Distribution Agent or Lead Litigation Attorney, as the case may be, is required to hold such distributions in a manner that does not modify, limit or impair

Dale K. Cathell Virginia Callahan February 18, 2021 Page 2

the rights of any Plaintiff, estate, attorney, Advance Company, other funding company, lender or other person or entity with respect to the Plaintiff's Delayed Distributions. <sup>1</sup>

The Trustee has determined that issues exist that are delaying his ability to timely remit payment of the distributions (the "Assigned Distributions") listed in the enclosed schedule (the "Schedule"). The Plaintiffs listed in the Schedule have not designated Designated Distribution Agents. Accordingly, the Trustee is remitting the Assigned Distributions, which may include associated attorneys' fees and amounts due to Advance Companies, other funding companies, lenders or other persons or entities, to you as the Lead Litigation Attorneys for such Plaintiffs, as indicated in the Schedule.<sup>2</sup> A check payable to your law firm is enclosed in the amount of the Assigned Distributions being remitted to you.

The Schedule also provides limited information about the principal issues that were delaying the Trustee's ability to distribute the Assigned Distributions and indicates how the Trustee anticipated distributing the Assigned Distributions, based on the information available to him, but for the issues that were delaying the Trustee's ability to timely distribute the Assigned Distributions. The Trustee is providing such information and allocation solely for informational purposes, without representation or warranty that it is correct and complete. We urge you to undertake your own analysis of the legal actions that may be required before you release any of the Assigned Distributions and make your own determination of to how the Assigned Distributions should be allocated.

Please acknowledge your receipt of this letter and check by signing where indicated below and returning a scan of the letter by email.

If you have any questions, or we can be of assistance, please let us know promptly.

Very truly yours,

Alan H. Katz

RECEIPT ACKNOWLEDGED:

Print Name: \_\_\_\_\_\_, 2021

**Enclosures** 

<sup>&</sup>lt;sup>1</sup> This letter summarizes the relevant provisions of the Order. We suggest that you review the provisions of the Order in their entirety.

<sup>&</sup>lt;sup>2</sup> The Trustee is designating Lead Litigation Attorneys only for the purpose of assigning payments as described herein and not for any other purpose.

**BLD ADMINISTRATOR** PO BOX 4199 PORTLAND OR 97208-4199

UBS FINANCIAL SERVICES, INC

**CHECK NUMBER** 7041

DATE

02/12/2021

Void if not negotiated on or before March 1, 2021.

ARNING: THIS DOCUMENT CONTAINS SEVERAL DOCUMENT SECURITY FEATURES

PAY EXACTLY \*\*\*\*\*\*\*\*\* ONE HUNDRED EIGHTY ONE THOUSAND NINE HUNDRED **EIGHTY AND 98/100 DOLLARS** 

**AMOUNT** \$181,980.98

PAY TO THE ORDER OF: **DLA PIPER** 

This check may not be cashed at a check cashing agency or money service business.

Delayer Distributions Assignment, per 2/28/20 court order

""000000704 \"""1044000B041

\$181,980.98

7,989.55

\$

36,219.28

\$

23,873.37

\$

113,898.78

\$

TOTAL

# PETERSON FUND AMOUNTS ASSIGNED

# DRAFT FOR DISCUSSION PURPOSES ONLY PRIVILEGED & CONFIDENTIAL

		PLAINTIFF	<b>DLA PIPER</b>	PLAINTIFF	<b>DLA PIPER</b>	
Z	PAYEE/PLAINTIFF	AMOUNT	AMOUNT	AMOUNT	AMOUNT	TOTAL
1486		\$ 10,649.27	\$ 2,232.11	\$ 3,386.42	\$ 747.00	\$ 17,014.80
1491		33,306.29	6,981.05	10,591.25	2,336.30	53,214.89
1520		53,290.07	11,169.69	16,945.99	3,738.09	85,143.84
1532		16,653.15	3,490.53	5,295.62	1,168.15	26,607.45

FINAL

**PRE-FINAL** 

1N	Plaintiff	Estate Representative	Lead Litigation Attorney	Principal Defects
1486			DLA Piper	FCDA not returned
1491			DLA Piper	Missing payment instructions
1520			DLA Piper	FCDA not returned
1532			DLA Piper	FCDA not returned

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#### **EXHIBIT B-1**



Brookfield Place, 200 Vesey Street 20th Floor New York, NY 10281-2101 Telephone: 212-415-8600 Fax: 212-303-2754 www.lockelord.com

Alan H. Katz
Direct Telephone: 212-415-8509
Direct Fax: 212-812-8380
akatz@lockelord.com

February 22, 2021

#### By E-Mail and FedEx:

Caragh Fay Fay Law Group, P.A. 777 Sixth Street, NW, Suite 410 Washington, DC 20001

Patrick M. Donahue The Donahue Law Firm, LLC 18 West Street Annapolis, MD 21401 Joseph Peter Drennan Attorney at Law 218 North Lee Street Alexandria, VA 22314-2631

Re: Peterson Fund – Assignment of Distributions

#### Dear Counsel:

As you know, we represent Kenneth R. Feinberg, Successor Trustee (the "Trustee") of the Peterson §468B Qualified Settlement Fund (the "Fund"). As described in the motion (ECF No. 1059, the "Motion") filed by the Trustee on January 22, 2020 in *Peterson, et al. v. Islamic Republic of Iran, et al.*, Case No. 10-4518, U.S. District Court for the Southern District of New York (the "Peterson Case"), the Trustee has been making Pre-Final and Final Distributions and associated attorneys' fees.

Pursuant to an order (ECF No. 1070, the "Order") entered by the District Court, where the Trustee determines that one or more issues exist that may delay the Trustee's ability to timely remit payment of one or more of the distributions, the Trustee is authorized, among other things, to transfer and assign such distributions, which may include attorneys' fees and/or amounts owed to advance or funding companies, to a distribution agent designated by the relevant Plaintiff (a "Designated Distribution Agent") or to the lead attorney authorized to represent such Plaintiff in connection with the Peterson Case (the "Lead Litigation Attorney"), to be held in trust pending resolution of such issues.

The Order further provides that: (a) once such distributions have been transferred as provided in the Order, the Fund and the Trustee shall have no further liability for, or responsibility regarding, such distributions and (b) the transfer of such distributions to a Designated Distribution Agent or Lead Litigation Attorney shall not modify, limit or impair the rights of any Plaintiff, estate, attorney, advance company or other funding company, lender or other person or entity with respect to such distributions. Accordingly, a Designated Distribution Agent or Lead Litigation Attorney, as the case may be, is required to hold such distributions in a manner that does not modify, limit or impair

Caragh Fay Patrick M. Donahue Joseph Peter Drennan February 22, 2021 Page 2

the rights of any Plaintiff, estate, attorney, Advance Company, other funding company, lender or other person or entity with respect to the Plaintiff's Delayed Distributions. <sup>1</sup>

The Trustee has determined that issues exist that are delaying his ability to timely remit payment of the distributions (the "Assigned Distributions") listed in the enclosed schedule (the "Schedule"). The Plaintiffs listed in the Schedule have not validly designated appropriate Designated Distribution Agents. Accordingly, the Trustee is remitting the Assigned Distributions, which may include associated attorneys' fees and amounts due to Advance Companies, other funding companies, lenders or other persons or entities, to you as the Lead Litigation Attorneys for such Plaintiffs, as indicated in the Schedule.<sup>2</sup> A check payable to you or your law firm is enclosed in the amount of the Assigned Distributions being remitted to you.

The Schedule also provides limited information about the principal issues that were delaying the Trustee's ability to distribute the Assigned Distributions and indicates how the Trustee anticipated distributing the Assigned Distributions, based on the information available to him, but for the issues that were delaying the Trustee's ability to timely distribute the Assigned Distributions. The Trustee is providing such information and allocation solely for informational purposes, without representation or warranty that it is correct and complete. We urge you to undertake your own analysis of the legal actions that may be required before you release any of the Assigned Distributions and make your own determination of to how the Assigned Distributions should be allocated.

Please acknowledge your receipt of this letter and check by signing where indicated below and returning a scan of the letter by email.

If you have any questions, or we can be of assistance, please let us know promptly.

Very truly yours,

Alan H. Katz

RECEIPT ACKNOWLEDGED:

Print Name:	
Insert Date:	, 2021

Enclosures

<sup>&</sup>lt;sup>1</sup> This letter summarizes the relevant provisions of the Order. We suggest that you review the provisions of the Order in their entirety.

<sup>&</sup>lt;sup>2</sup> The Trustee is designating Lead Litigation Attorneys only for the purpose of assigning payments as described herein and not for any other purpose.

Caragh Fay Patrick M. Donahue Joseph Peter Drennan February 22, 2021 Page 3

cc (via email, w/ encls.):

Theodore S. Allison
Ferris Bond
James P. Bonner
Douglas M. Bregman
Fredric J. Einhorn
Keith M. Fleischman
Daniel W. Gaskill
Elizabeth A. Green
Geoffrey T. Hervey
Tracy R. Kalik
Anthony J. LaSpada

Hanna Mayer
Tuna Mecit
Jane C. Norman
Noel J. Nudelman
Alan J. Nuta
Charles C. Parsons
Steven R. Perles
Harry Rothenberg
Ralph M. Stone
Liviu Vogel

**EXHIBIT Q** 

PETERSON FUND AMOUNTS ASSIGNED

#### DRAFT FOR DISCUSSION PURPOSES ONLY

PRIVILEGED & CONFIDENTIA	AL İ								TN NU	MRFR									ı i
TN:	316	343	359	362	424	<u>592</u>	<u>763</u>	839	925	996	1061	1107	1120	1308 <sup>3</sup>	1363	1397	1693	1728	TOTAL
LEAD ATTORNEY <sup>1</sup> :	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	PMD	JPD	FLF	PMD	FLF	FLF	FLF	<u></u>
	I	I		1									I						
SCDA AMOUNTS:																			
Plaintiff amounts:																			
Plaintiff portion assigned									\$ 29,731.94										\$ 29,731.94
						ĺ					ĺ			ĺ	ĺ				
Attorney fee portion:																			
DRENNAN					\$ 2,596.56				\$ -							\$ -			\$ 2,596.56
SALON MARROW					2,812.94				1,406.47							843.88			5,063.29
BONNER <sup>2</sup>					1,298.28				649.14							389.48			2,336.90
FAY					7,380.96				6,184.86							3,710.91			17,276.73
PERLES					7,380.96				6,184.86							3,710.91			17,276.73
ROTHENBERG					7,380.96				-							-			7,380.96
Total attorney fee portion	\$ -	\$ -	\$ -	\$ -	\$28,850.65	\$ -	\$ -	\$ -	\$ 14,425.32	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,655.19	\$ -	\$ -	\$ 51,931.16
													١.						
TOTAL SCDAS	\$ -	\$ -	\$ -	\$ -	\$28,850.65	\$ -	\$ -	\$ -	\$ 44,157.26	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,655.19	\$ -	\$ -	\$ 81,663.10
PRE-FINAL AMOUNTS:																			
District of the second																			
Plaintiff amounts: Plaintiff portion assigned			\$ 8,180.50	¢ 22.166.25		¢ 0.764.52	¢ 2.021.40	¢ 44 222 E0	\$ 22,166.25	¢ = 762.22	¢ 22.166.25	¢ 026452	\$ -	\$ 22,166.25			¢ 0.000 E0	¢ 2.040.02	\$178,317.27
RD Legal amount assigned			\$ 8,180.50	\$ 22,100.23		\$ 8,204.32	\$ 5,351.49	\$ 44,552.50	\$ 22,100.23	\$ 3,703.23	\$ 22,100.23	\$ 6,204.32	44,332.50	\$ 22,100.23			\$ 6,600.50	\$ 2,049.02	44,332.50
Specialty amount assigned						13,901.73							44,332.30						13,901.73
specialty amount assigned						13,301.73					l			l	l				13,901.73
Attorney fee portion:																			
DRENNAN					\$ 1,311.30														\$ 1,311.30
KARR					. ,.	l		1,311.30			l			l	l				1,311.30
MECIT		655.65				655.65		,			Ì			Ì	Ì				1,311.30
SALON MARROW		710.29			1,420.57	710.29		1,420.57	710.29	184.67	710.29		1,420.57	710.29	994.40	426.17			9,418.39
BONNER <sup>2</sup>		327.82		ĺ	655.65	327.82			327.82	85.23	327.82	ĺ	655.65	327.82	458.95	196.69			3,691.30
FLEISCHMAN								1,529.85				i							1,529.85
FAY		1,863.74			3,727.48	1,863.74		859.02	3,123.44	812.09	3,123.44		1,561.72	1,041.15	1,093.20	1,874.06			20,943.08
PERLES		1,863.74		ĺ	3,727.48	1,863.74		859.02	3,123.44	812.09	3,123.44	ĺ	1,561.72	1,041.15	1,093.20	1,874.06			20,943.08
GASKILL								1,718.04					3,123.44		2,186.41				7,027.88
HNK														4,164.58					4,164.58
DRENNAN								1,718.04					3,123.44		2,186.41				7,027.88
DONAHUE								1,718.04					3,123.44		2,186.41				7,027.88
ROTHENBERG		1,863.74			3,727.48	1,863.74		3,436.08											10,891.05
Total attorney fee portion		7,284.98	-	-	14,569.97	7,284.98	-	14,569.97	7,284.98	1,894.10	7,284.98	-	14,569.97	7,284.98	10,198.98	4,370.99	-	-	96,598.89
TOTAL PRE-FINAL		7,284.98	8,180.50	22,166.25	14,569.97	29,451.23	3,931.49	58,902.47	29,451.23	7,657.32	29,451.23	8,264.52	58,902.47	29,451.23	10,198.98	4,370.99	8,866.50	2,049.02	333,150.39
FINAL AMOUNTS:																			
District and a second																			
Plaintiff amounts: Plaintiff portion assigned	\$ 2,740.13		\$ 1,473.91	\$ 3,993.78		\$ 3,993.78	¢ 700 25	\$ 7,987.55	\$ 3,993.78	\$ 1,038.38	\$ 3,993.78	\$ 3,993.78	\$ -	\$ 3,993.78			\$ 1,597.51	\$ 369.18	\$ 39,877.68
RD Legal amount assigned	2,740.13		y 1,4/3.31	3,.255.78		ا.دوورد پ	7 /00.33	55.105,1 پ	3/.555ر پ	y 1,030.38	3,333.78	3,555.78	7,987.55	J 3,333./8			1,357.31	y 303.18	7,987.55
No Legal amount assigned						l I					l I		1,501.33	l I	l I				1,501.55
	I	1 1		1		l					l	I	I	l	l	ļ			ı

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TN:	<u>316</u>	<u>343</u>	<u>359</u>	<u>362</u>	<u>424</u>	<u>592</u>	<u>763</u>	<u>839</u>	<u>925</u>	<u>996</u>	<u>1061</u>	<u>1107</u>	<u>1120</u>	1308 <sup>3</sup>	1363	<u>1397</u>	<u>1693</u>	<u>1728</u>	TOTAL
LEAD ATTORNEY1:	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	PMD	JPD	FLF	PMD	FLF	FLF	FLF	
Attorney fee portion:																			
DRENNAN					\$ 359.44														\$ 359.44
KARR								359.44											359.44
MECIT		179.72				179.72													359.44
SALON MARROW		194.70			389.39	194.70		389.39	194.70	50.62	194.70		389.39	194.70	272.58	116.82			2,581.68
BONNER <sup>2</sup>		89.86			179.72	89.86			89.86	23.36	89.86		179.72	89.86	125.80	53.92			1,011.82
FLEISCHMAN					Ì			419.35						Ì	Ì	Ì			419.35
FAY		510.87			1,021.74	510.87		235.47	856.17	222.60	856.17		428.08	285.39	299.66	513.70			5,740.72
PERLES		510.87			1,021.74	510.87		235.47	856.17	222.60	856.17		428.08	285.39	299.66	513.70			5,740.72
GASKILL					Ì			470.93					856.17	Ì	599.32	Ì			1,926.41
HNK					Ì									1,141.55	Ì	Ì			1,141.55
DRENNAN								470.93					856.17		599.32				1,926.41
DONAHUE								470.93					856.17		599.32				1,926.41
ROTHENBERG		510.87			1,021.74	510.87		941.87											2,985.35
Total attorney fee portion	\$ -	\$ 1,996.89	\$ -	\$ -	\$ 3,993.77	\$ 1,996.89	\$ -	\$ 3,993.78	\$ 1,996.90	\$ 519.18	\$ 1,996.90	\$ -	\$ 3,993.77	\$ 1,996.89	\$ 2,795.65	\$ 1,198.13	\$ -	\$ -	\$ 26,478.75
TOTAL FINAL	\$ 2,740.13	\$ 1,996.89	\$ 1,473.91	\$ 3,993.78	\$ 3,993.77	\$ 5,990.66	\$ 708.35	\$11,981.34	\$ 5,990.67	\$1,557.57	\$ 5,990.67	\$ 3,993.78	\$11,981.32	\$ 5,990.67	\$ 2,795.65	\$ 1,198.13	\$ 1,597.51	\$ 369.18	\$ 74,343.98
TOTAL ALL	\$ 2,740.13	\$ 9,281.87	\$ 9,654.41	\$26,160.03	\$47,414.39	\$35,441.90	\$4,639.84	\$70,883.81	\$ 79,599.17	\$9,214.89	\$35,441.91	\$12,258.30	\$70,883.79	\$35,441.90	\$12,994.63	\$14,224.32	\$10,464.01	\$ 2,418.20	\$489,157.48
TOTAL PLAINTIFF AMOUNT	\$ 2,740.13	\$ -	\$ 9,654.41	\$26,160.03	\$ -	\$12,258.30	\$ 4,639.84	\$52,320.05	\$ 55,891.97	\$6,801.61	\$26,160.03	\$12,258.30	\$ -	\$26,160.03	\$ -	\$ -	\$10,464.01	\$ 2,418.20	\$247,926.89
TOTAL RD LEGAL	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$52,320.05	\$ -	\$ -	\$ -	\$ -		\$ 52,320.05
TOTAL SPECIALTY	\$ -	\$ -	\$ -	\$ -	\$ -	\$13,901.73	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,901.73
TOTAL ATTORNEY FEES	\$ -	\$ 9,281.87	\$ -	\$ -	\$47,414.39	\$ 9,281.87	\$ -	\$18,563.75	\$ 23,707.20	\$2,413.28	\$ 9,281.88	\$ -	\$18,563.74	\$ 9,281.88	\$12,994.63	\$14,224.32	\$ -	\$ -	\$175,008.81
<sup>1</sup> Lead attorney abbreviation:	s: FLF-Fay Law	/ Firm, PMD- P	atrick M. Don	ahue, HNK-No	el Nudelman,	JPD- Joseph P	. Drennan												
<sup>2</sup> Bonner fees should be paid	as follows: 2/	3 to Fleischma	an Bonner and	Rocco LLP an	d 1/3 to Stone	Law Group Pl	LLC.												
<sup>3</sup> TN 1308 is being assigned to	o Fay Law Firn	n at the reque	st and consen	t of Heidemar	Nudelman &	Kalik, PC and	Fay Law Firm												
	,					. ,	.,	l.	Į.	ı				ı	ı	1		1	1

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TN	Plaintiff	Estate Representative	Lead Litigation Attorney	Principal Defects
316			Fay Law Group	Conflicting payment instructions
343			Fay Law Group	Estate issue-awaiting distribution order
359			Fay Law Group	FCDA not returned
362			Fay Law Group	FCDA incomplete
424			Fay Law Group	Estate issue-awaiting distribution order
592			Fay Law Group	Missing estate info; FCDA not returned
763			Fay Law Group	Conflicting payment instructions
839			Fay Law Group	Missing estate info
925			Fay Law Group	Missing estate info; SCDA incomplete; FCDA not returned
996			Fay Law Group	FCDA not returned; missing estate info
1061			Fay Law Group	FCDA not returned
1107			Patrick M. Donahue	FCDA not returned
1120			Joseph P. Drennan	Estate not opened; FCDA not returned
1308			Fay Law Group	FCDA incomplete; missing estate info
1363			Patrick M. Donahue	Estate issue-awaiting distribution order
1397			Fay Law Group	Estate issue-awaiting distribution order
1693			Fay Law Group	FCDA not returned
1728			Fay Law Group	FCDA not returned

**BLD ADMINISTRATOR** PO BOX 4199 PORTLAND OR 97208-4199

UBS FINANCIAL SERVICES, INC

CHECK NUMBER 7040

DATE 02/12/2021

Void if not negotiated on or before March 1, 2021.

PAY EXACTLY \*\*\*\*\*\*\*\* TWENTY FIVE THOUSAND TWO HUNDRED FIFTY TWO

AND 92/100 DOLLARS

AMOUNT \$25,252.92

PAY TO THE ORDER OF:

THE DONAHUE LAW FIRM TRUST ACCOUNT

This check may not be cashed at a check cashing agency or money service business.

Delayed Distributions Assymment, per 2/28/20 Gart Onler

"0000007040""1044000B041

**BLD ADMINISTRATOR** PO BOX 4199

PORTLAND OR 97208-4199

UBS FINANCIAL SERVICES, INC

DATE

CHECK NUMBER 7039

02/12/2021

Void if not negotiated on or before March 1, 2021.

WARNING: THIS DOCUMENT CONTAINS SEVERAL DOCUMENT SECURITY FEATURE

PAY EXACTLY \*\*\*\*\*\*\*\*\* SEVENTY THOUSAND EIGHT HUNDRED EIGHTY THREE

AND 79/100 DOLLARS

AMOUNT \$70,883.79

PAY TO THE ORDER OF:

JOSEPH PETER DRENNAN, IN TRUST, IN RE ESTATE OF MOSES ARNOLD

This check may not be cashed at a check cashing agency or money service business.

Deleyed Distributions Assignment, per 2/28/20 court order

#0000007039###044000B04#

**BLD ADMINISTRATOR** PO BOX 4199 PORTLAND OR 97208-4199 UBS FINANCIAL SERVICES, INC

CHECK NUMBER

7038

DATE 02/12/2021

Void if not negotiated on or before March 1, 2021.

PAY EXACTLY \*\*\*\*\*\*\*\* THREE HUNDRED NINETY THREE THOUSAND TWENTY

AMOUNT

AND 77/100 DOLLARS

\$393,020.77

PAY TO THE ORDER OF: FAY LAW GROUP

This check may not be cashed at a check cashing agency or money service business.

Delayer Distributions Assignment, per 2/28/20 Court Order

Authorized Signature

# **EXHIBIT B-2**

EXHIBIT Q

PETERSON FUND
AMOUNTS ASSIGNED

DRAFT FOR DISCUSSION PURPOSES ONLY

PRIVILEGED & CONFIDENTIA	AL																		1
									TN NU					3					
TN:	<u>316</u>	<u>343</u>	<u>359</u>	<u>362</u>	<u>424</u>	<u>592</u>	<u>763</u>	<u>839</u>	<u>925</u>	<u>996</u>	<u>1061</u>	<u>1107</u>	<u>1120</u>	1308 <sup>3</sup>	<u>1363</u>	<u>1397</u>	<u>1693</u>	<u>1728</u>	TOTAL
LEAD ATTORNEY1:	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF I	PMD I	JPD I	FLF	PMD	FLF	FLF	FLF	
SCDA AMOUNTS:																			
Plaintiff amounts:																			
Plaintiff portion assigned									\$ 29,731.94										\$ 29,731.94
· · · · · · · · · · · · · · · · · · ·									7 20,102.01										ψ 23,731.3 ·
Attorney fee portion:																			
DRENNAN					\$ 2,596.56				\$ -							\$ -			\$ 2,596.56
SALON MARROW					2,812.94				1,406.47							843.88			5,063.29
BONNER <sup>2</sup>					1,298.28				649.14							389.48			2,336.90
FAY					7,380.96				6,184.86							3,710.91			17,276.73
PERLES					7,380.96				6,184.86							3,710.91			17,276.73
ROTHENBERG					7,380.96				-							-			7,380.96
Total attorney fee portion	Ş -	\$ -	Ş -	\$ -	\$28,850.65	Ş -	Ş -	\$ -	\$ 14,425.32	\$ -	\$ -	\$ -	\$ -	Ş -	\$ -	\$ 8,655.19	Ş -	\$ -	\$ 51,931.16
TOTAL SCDAS	\$ -	\$ -	\$ -	\$ -	\$28,850.65	\$ -	\$ -	\$ -	\$ 44,157.26	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,655.19	\$ -	\$ -	\$ 81,663.10
TOTAL SCDAS	, -	, ·	, -	, -	\$20,030.03	, -	- ب	, -	3 44,137.20	. ·	ý -	, -	, -	, -	, -	\$ 6,033.13	, -	, -	\$ 81,003.10
PRE-FINAL AMOUNTS:																			
Plaintiff amounts:																			
Plaintiff portion assigned			\$ 8,180.50	\$ 22,166.25		\$ 8,264.52	\$ 3,931.49	\$ 44,332.50	\$ 22,166.25	\$ 5,763.23	\$ 22,166.25	\$ 8,264.52	\$ -	\$ 22,166.25			\$ 8,866.50	\$ 2,049.02	\$178,317.27
RD Legal amount assigned													44,332.50						44,332.50
Specialty amount assigned						13,901.73													13,901.73
Attorney fee portion:					ć 4 244 20														4
DRENNAN KARR					\$ 1,311.30			1,311.30			l .								\$ 1,311.30
MECIT		655.65				655.65		1,311.30			l I								1,311.30 1,311.30
SALON MARROW		710.29			1,420.57	710.29		1,420.57	710.29	184.67	710.29		1,420.57	710.29	994.40	426.17			9,418.39
BONNER <sup>2</sup>		327.82			655.65	327.82		2, 120.57	327.82	85.23	327.82		655.65	327.82	458.95	196.69			3,691.30
FLEISCHMAN		327.82			033.03	327.02		1,529.85	327.82	03.23	327.02		033.03	327.02	430.33	150.05			1,529.85
FAY		1,863.74			3,727.48	1,863.74		3,436.09	3,123.44	812.09	3,123.44		1,561.72	1,041.15	1,093.20	1,874.06			23,520.15
PERLES		1,863.74			3,727.48	1,863.74		3,436.09	3,123.44	812.09	3,123.44		1,561.72	1,041.15	1,093.20	1,874.06			23,520.15
GASKILL								-					3,123.44		2,186.41				5,309.84
HNK														4,164.58					4,164.58
DRENNAN								-					3,123.44		2,186.41				5,309.84
DONAHUE								-					3,123.44		2,186.41				5,309.84
ROTHENBERG		1,863.74			3,727.48	1,863.74		3,436.08											10,891.05
Total arrange of the st		7			44.500.00	7.00.00		44.500.00	7.00.00	4.001.15	7.00.00		44.500.00	7.00.00	40.400.00	4.270.00			06 500 00
Total attorney fee portion		7,284.98	-	-	14,569.97	7,284.98	-	14,569.97	7,284.98	1,894.10	7,284.98	-	14,569.97	7,284.98	10,198.98	4,370.99	-	-	96,598.89
TOTAL PRE-FINAL		7,284.98	8,180.50	22,166.25	14,569.97	29,451.23	3,931.49	58,902.47	29,451.23	7,657.32	29,451.23	8,264.52	58,902.47	29,451.23	10,198.98	4,370.99	8,866.50	2.049.02	333,150.39
TOTAL THE TIMAL		1,404.70	0,100.30	22,100.23	14,303.37	∠J,≒J1.∠3	3,331.49	30,302.47	دع،بدع دع،بدع	1,031.32	23,431.23	0,204.32	30,302.47	∠J,≒J1.∠3	10,170.76	4,370.33	0,000.30	2,043.02	333,130.33
FINAL AMOUNTS:																			
Plaintiff amounts:																			
Plaintiff portion assigned	\$ 2,740.13		\$ 1,473.91	\$ 3,993.78		\$ 3,993.78	\$ 708.35	\$ 7,987.55	\$ 3,993.78	\$ 1,038.38	\$ 3,993.78	\$ 3,993.78	\$ -	\$ 3,993.78			\$ 1,597.51	\$ 369.18	\$ 39,877.68
RD Legal amount assigned													7,987.55						7,987.55

# Case 1:10-cv-04518-LAP Document 1096-3 Filed 03/26/21 Page 17 of 59

TN:	<u>316</u>	<u>343</u>	<u>359</u>	<u>362</u>	<u>424</u>	<u>592</u>	<u>763</u>	<u>839</u>	<u>925</u>	<u>996</u>	<u>1061</u>	<u>1107</u>	<u>1120</u>	1308 <sup>3</sup>	<u>1363</u>	<u>1397</u>	<u>1693</u>	1728	<u>TOTAL</u>
LEAD ATTORNEY1:	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	PMD	JPD	FLF	PMD	FLF	FLF	FLF	
Attorney fee portion:																			
DRENNAN					\$ 359.44														\$ 359.44
KARR								359.44											359.44
MECIT		179.72				179.72													359.44
SALON MARROW		194.70			389.39	194.70		389.39	194.70	50.62	194.70		389.39	194.70	272.58	116.82			2,581.68
BONNER <sup>2</sup>		89.86			179.72	89.86			89.86	23.36	89.86		179.72	89.86	125.80	53.92			1,011.82
FLEISCHMAN								419.35											419.35
FAY		510.87			1,021.74	510.87		941.87	856.17	222.60	856.17		428.08	285.39	299.66	513.70			6,447.12
PERLES		510.87			1,021.74	510.87		941.87	856.17	222.60	856.17		428.08	285.39	299.66	513.70			6,447.12
GASKILL								-					856.17		599.32				1,455.48
HNK														1,141.55					1,141.55
DRENNAN								-					856.17		599.32				1,455.48
DONAHUE								-					856.17		599.32				1,455.48
ROTHENBERG		510.87			1,021.74	510.87		941.87											2,985.35
Total attorney fee portion	\$ -	\$ 1,996.89	\$ -	\$ -	\$ 3,993.77	\$ 1,996.89	\$ -	\$ 3,993.78	\$ 1,996.90	\$ 519.18	\$ 1,996.90	\$ -	\$ 3,993.77	\$ 1,996.89	\$ 2,795.65	\$ 1,198.13	\$ -	\$ -	\$ 26,478.74
TOTAL FINAL	\$ 2,740.13	\$ 1,996.89	\$ 1,473.91	\$ 3,993.78	\$ 3,993.77	\$ 5,990.66	\$ 708.35	\$11,981.33	\$ 5,990.67	\$1,557.57	\$ 5,990.67	\$ 3,993.78	\$11,981.32	\$ 5,990.67	\$ 2,795.65	\$ 1,198.13	\$ 1,597.51	\$ 369.18	\$ 74,343.98
TOTAL ALL	\$ 2,740.13	\$ 9,281.87	\$ 9,654.41	\$26,160.03	\$47,414.39	\$35,441.90	\$4,639.84	\$70,883.80	\$ 79,599.17	\$9,214.89	\$35,441.91	\$12,258.30	\$70,883.79	\$35,441.90	\$12,994.63	\$14,224.32	\$10,464.01	\$ 2,418.20	\$489,157.47
TOTAL PLAINTIFF AMOUNT	\$ 2,740.13	\$ -	\$ 9,654.41	\$26,160.03	\$ -	\$12,258.30	\$4,639.84	\$52,320.05	\$ 55,891.97	\$6,801.61	\$26,160.03	\$12,258.30	\$ -	\$26,160.03	\$ -	\$ -	\$10,464.01	\$ 2,418.20	\$247,926.89
TOTAL RD LEGAL	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$52,320.05	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 52,320.05
TOTAL SPECIALTY	\$ -	\$ -	\$ -	\$ -	\$ -	\$13,901.73	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,901.73
TOTAL ATTORNEY FEES	\$ -	\$ 9,281.87	\$ -	\$ -	\$47,414.39	\$ 9,281.87	\$ -	\$18,563.75	\$ 23,707.20	\$2,413.28	\$ 9,281.88	\$ -	\$18,563.74	\$ 9,281.88	\$12,994.63	\$14,224.32	\$ -	\$ -	\$175,008.80
<sup>1</sup> Lead attorney abbreviation:	s: FLF-Fay Law	Firm, PMD- P	atrick M. Don	ahue, HNK-No	el Nudelman,	JPD- Joseph P.	Drennan												
<sup>2</sup> Bonner fees should be paid	•			•		•													
<sup>3</sup> TN 1308 is being assigned to					•			1											
114 1300 is being assigned to	oray Law Filli	i at the reques	st and consen	t of Herdellian	Nuuciiiaii &	Kalik, i C aliu i	ay Law Filli						l	l			l	I	

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TN	Plaintiff	Estate Representative	Lead Litigation Attorney	Principal Defects
316			Fay Law Group	Conflicting payment instructions
343			Fay Law Group	Estate issue-awaiting distribution order
359			Fay Law Group	FCDA not returned
362			Fay Law Group	FCDA incomplete
424			Fay Law Group	Estate issue-awaiting distribution order
592			Fay Law Group	Missing estate info; FCDA not returned
763			Fay Law Group	Conflicting payment instructions
839			Fay Law Group	Missing estate info
925			Fay Law Group	Missing estate info; SCDA incomplete; FCDA not returned
996			Fay Law Group	FCDA not returned; missing estate info
1061			Fay Law Group	FCDA not returned
1107			Patrick M. Donahue	FCDA not returned
1120			Joseph P. Drennan	Estate not opened; FCDA not returned
1308			Fay Law Group	FCDA incomplete; missing estate info
1363			Patrick M. Donahue	Estate issue-awaiting distribution order
1397			Fay Law Group	Estate issue-awaiting distribution order
1693			Fay Law Group	FCDA not returned
1728			Fay Law Group	FCDA not returned

# EXHIBIT 6 (pt. 2)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT NEW YORK

	·X	
DEBORAH D. PETERSON, Personal Representative of the Estate of James C. Knipple (Dec.), et al.,	: : : : : : : : : : : : : : : : : : : :	Casa No. 10 Civ. 4519 (LAP)
Plaintiffs,	:	Case No. 10 Civ. 4518 (LAP) CONSOLIDATED
	:	
V.	:	
ISLAMIC REPUBLIC OF IRAN, BANK MARKAZI a/k/a CENTRAL BANK OF IRAN BANCA UBAE SPA; CITIBANK, N.A.; and	: : N;: :	
CLEARSTREAM BANKING, S.A.	:	
Defendants.	:	
	:	
	X	

#### DECLARATION OF CHARLES MARR

- I, Charles Marr, declare as follows:
- 1. I am employed by Epiq Class Action & Claims Solutions, Inc. ("Epiq") as Project Director. I am providing this declaration concerning the sending of notices of assignments of Delayed Distributions to Lead Attorneys and Designated Distribution Agents.
- 2. On March 10, 2021, I caused notices (each a "Notice") to be sent by U.S. mail, first class postage prepaid, addressed to the Plaintiffs assigned the following tracking numbers at such Plaintiffs' last know addresses:

TN 316	TN 763	TN 1120	TN 1520
TN 343	TN 839	TN 1308	TN 1532
TN 359	TN 925	TN 1363	TN 1693
TN 362	TN 996	TN 1397	TN 1728
TN 424	TN 1061	TN 1486	
TN 592	TN 1107	TN 1491	

3. Copies of the Notices were sent by email as follows:

For TN 316, TN 343, TN 359, TN 362, TN 424, TN 592, TN 763, TN 839, TN 925, TN 996, TN 1061, TN 1308, TN 1397, TN 1693 and TN 1728:

Lead Attorney: Caragh Fay caragh.fay@faylawgroup.com

#### For TN 1107 and TN 1363:

Lead Attorney: Patrick M. Donahue pmd@wisedonahue.com

#### For TN 1120:

Lead Attorney: Joseph Peter Drennan joseph@josephpeterdrennan.com

#### For TN 1486; TN 1491; TN 1520 and TN 1532:

Lead Attorney:
Dale K. Cathell
dale.cathell@dlapiper.com

#### For TN 343, TN 424 and TN 1397:

Designated Distribution Agent and Estate Counsel: Leah Shedlo Ishedlo@yahoo.com

#### For TN 1363:

Designated Distribution Agent and Estate Counsel: Kevin P. Connolly connollylaw@aol.com

#### For TN 592:

Advance Company: Specialty Claims Investments, LLC susandicicco@morganlewis.com and striant@silverpointcapital.com

#### For TN 1120:

Advance Company: RD Legal Funding Partners, LP pkwon@legalfunding.com and jrobinson@legalfunding.com For TN 316 and TN 359:

Estate counsel: Scott J. Rizzo, srizzo@rizzolaw.com

For TN 362, a copy of the Notice was sent by U.S. first class mail to:

Estate counsel:
J. Michael Foster
Foster Soyars & Assocs.
P.O. Box 24
Hopkinsville, KY 42241-0024

4. A specimen of the form of Notice is annexed hereto. The actual Notice sent to each Plaintiff included information specific to each Plaintiff's Delayed Distributions.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 16, 2021

Charles Marr, Esq., PMP

**Project Director** 

Epiq Class Action & Claims Solutions, Inc.

<b>SPECIM</b>	EN
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March [], 2021	Tracking No
[insert Plaintiff's Name and Address]	

Dear [insert Plaintiff's Name]:

Pursuant to an Order entered by the U.S. District Court for the Southern District of New York (the "District Court") in Peterson, et al. v. Islamic Republic of Iran, et al., Case No. 10-4518 (the "Peterson Case"), Kenneth R. Feinberg, Successor Trustee (the "Trustee") of the Peterson §468B Qualified Settlement Fund (the "Fund"), has made final distributions from the assets of the Fund. The District Court's Order provides, in part, that where the Trustee determines that one or more issues exist that may delay the Trustee's ability to timely remit payment of one or more of the distributions, the Trustee is authorized, among other things, to transfer and assign such distributions to a Designated Distribution Agent designated by the relevant Plaintiff or to the lead attorney authorized to represent such Plaintiff in connection with the Peterson Case (the "Lead Attorney"), to be held in trust pending resolution of such issues. The Order further provides that, once the delayed distributions have been transferred as provided in the Order, the Fund and the Trustee shall have no further liability for, or responsibility regarding, such distributions.<sup>1</sup>

The Trustee has determined that issues exist that have delayed and/or may delay the following distributions to be made to you or on your account:

Supplemental Distribution in the amount of \$[insert amount]. Pre-Final Distribution in the amount of \$[insert amount]. Final Distribution in the amount of \$[insert amount].

The foregoing amounts may include amounts due to attorneys, amounts due to advance companies and/or amounts due to you.

The Trustee has elected to transfer and is in the process of transferring the foregoing distributions to your Lead Attorney:

[insert Lead Attorney name and address]

For further information, please contact the Lead Attorney.

Sincerely,

Beirut Lawsuit Distribution Administrator

cc: [insert Lead Attorney name]
[insert estate counsel name, if applicable]
[insert advance company name, if applicable]

91475466v.1

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<sup>&</sup>lt;sup>1</sup> This letter's description of the District Court's Order is intended solely for informational purposes. The Trustee reserves all rights under the terms of the District Court's orders.

# **EXHIBIT "7"**

# EXHIBIT 7 (pt. 1)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT NEW YORK

DEBORAH D. PETERSON, Personal Representative of the Estate of James C. Knipple (Dec.), et al.,	:	
Plaintiffs,		Case No. 10 Civ. 4518 (LAP) CONSOLIDATED
V.	:	
ISLAMIC REPUBLIC OF IRAN, BANK MARKAZI a/k/a CENTRAL BANK OF IRAN; BANCA UBAE SpA; CITIBANK, N.A.; and CLEARSTREAM BANKING, S.A.	· · · · ·	
Defendants.	: :	
	X	

#### **DECLARATION**

- I, Alan H. Katz, declare as follows:
- 1. I am Of Counsel to Locke Lord LLP, attorneys for Successor Trustee Kenneth G. Feinberg (the "Trustee"). This declaration concerns the assignment of Delayed Distributions on account of undeliverable and/or uncashed checks to Lead Attorneys and Designated Distribution Agents.
- 2. Pursuant to the terms of the Court's Order entered on February 28, 2020 (the "Distribution Approval Order"), the Trustee determined that portions of Pre-Final and/or Final Distributions payable to the Plaintiffs assigned the following tracking numbers were Delayed Distributions because the Trustee's checks payable to such Plaintiffs were undeliverable or uncashed and, accordingly, the amounts thereof should be assigned to Lead Attorneys or Designated Distribution Agents:

TN 229	TN 536	TN 1222	TN 1515
TN 306	TN 735	TN 1399	TN 1518
TN 427	TN 926	TN 1478	TN 1770
TN 456	TN 965	TN 1489	
TN 515	TN 1032	TN 1501	
TN 534	TN 1217	TN 1509	

3. The Trustee canceled the outstanding checks payable to such Plaintiffs and assigned the amounts thereof to Lead Attorneys for such Plaintiffs by sending to such Lead Attorneys, by email, the letters attached hereto as Exhibits A and B and wiring the appropriate amount to each Lead Attorney. The letters included schedules identifying such Plaintiffs and the Lead Attorney for each such Plaintiff and detailing the amounts assigned with regard to each such Plaintiff. The Plaintiffs' names have been redacted from the schedules in Exhibits A and B.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 24, 2021

Alan H. Katz

#### Case 1:10-cv-04518-LAP Document 1096-3 Filed 03/26/21 Page 26 of 59 Exhibit A



Brookfield Place, 200 Vesey Street 20th Floor New York, NY 10281-2101 Telephone: 212-415-8600 Fax: 212-303-2754 www.lockelord.com

Alan H. Katz Direct Telephone: 212-415-8509 Direct Fax: 212-812-8380 akatz@lockelord.com

March 23, 2021

By E-Mail:

Dale K. Cathell Virginia Callahan DLA Piper LLP (US) The Marbury Building 6225 Smith Avenue Baltimore, Maryland 21209-3600

Re: Peterson Fund – Assignment of Distributions

Dear Counsel:

As you know, we represent Kenneth R. Feinberg, Successor Trustee (the "Trustee") of the Peterson §468B Qualified Settlement Fund (the "Fund"). As described in the motion (ECF No. 1059, the "Motion") filed by the Trustee on January 22, 2020 in *Peterson, et al. v. Islamic Republic of Iran, et al.*, Case No. 10-4518, U.S. District Court for the Southern District of New York (the "Peterson Case"), the Trustee has been making Pre-Final and Final Distributions and associated attorneys' fees.

Pursuant to an order (ECF No. 1070, the "Order") entered by the District Court, where the Trustee determines that one or more issues exist that may delay the Trustee's ability to timely remit payment of one or more of the distributions, the Trustee is authorized, among other things, to transfer and assign such distributions, which may include attorneys' fees and/or amounts owed to advance or funding companies, to a distribution agent designated by the relevant Plaintiff (a "Designated Distribution Agent") or to the lead attorney authorized to represent such Plaintiff in connection with the Peterson Case (the "Lead Litigation Attorney"), to be held in trust pending resolution of such issues.

The Order further provides that: (a) once such distributions have been transferred as provided in the Order, the Fund and the Trustee shall have no further liability for, or responsibility regarding, such distributions and (b) the transfer of such distributions to a Designated Distribution Agent or Lead Litigation Attorney shall not modify, limit or impair the rights of any Plaintiff, estate, attorney, advance company or other funding company, lender or other person or entity with respect to such distributions. Accordingly, a Designated Distribution Agent or Lead Litigation Attorney, as the case may be, is required to hold such distributions in a manner that does not modify, limit or impair

Dale K. Cathell Virginia Callahan March 23, 2021 Page 2

the rights of any Plaintiff, estate, attorney, Advance Company, other funding company, lender or other person or entity with respect to the Plaintiff's Delayed Distributions. <sup>1</sup>

The Trustee has determined that issues exist that are delaying his ability to timely remit payment of the distributions (the "Assigned Distributions") listed in the enclosed schedule (the "Schedule"). Specifically, the Plaintiffs listed in the Schedule have not received or have not cashed checks sent to them for the payments listed in the Schedule. Accordingly, the Trustee has canceled the checks and is remitting the Assigned Distributions to you as the Lead Litigation Attorneys for such Plaintiffs, as indicated in the Schedule, for further handling as you deem appropriate. Funds in the total amount of the Assigned Distributions are being wired to your firm per instructions that you have provided.

Please acknowledge your receipt of this letter and check by signing where indicated below and returning a scan of the letter by email.

If you have any questions, or we can be of assistance, please let us know promptly.

Very truly yours,

Alan H. Katz

RECEIPT ACKNOWLEDGED:

Print Name: \_\_\_\_\_\_, 2021

Enclosure

<sup>&</sup>lt;sup>1</sup> This letter summarizes the relevant provisions of the Order. We suggest that you review the provisions of the Order in their entirety.

# Case 1:10-cv-04518-LAP Document 1096-3 Filed 03/26/21 Page 28 of 59

Epiq	Plaintiff	Representative	Case	Lead Litigation Attorney	Payment Type	Amount
1478			Heiser	DLA Piper	Final Payment	\$ 10,591.25
1489			Heiser	DLA Piper	Final Payment	\$ 5,211.88
1501			Heiser	DLA Piper	Final Payment	\$ 7,879.93
1509			Heiser	DLA Piper	Final Payment	\$ 10,591.25
1515			Heiser	DLA Piper	Final Payment	\$ 5,295.62
1518			Heiser	DLA Piper	Final Payment	\$ 10,591.25
					Total	\$ 50,161.18

# Case 1:10-cv-04518-LAP Document 1096-3 Filed 03/26/21 Page 29 of 59 Exhibit B



Brookfield Place, 200 Vesey Street 20th Floor New York, NY 10281-2101 Telephone: 212-415-8600 Fax: 212-303-2754 www.lockelord.com

Alan H. Katz
Direct Telephone: 212-415-8509
Direct Fax: 212-812-8380
akatz@lockelord.com

March 23, 2021

By E-Mail:

Caragh Fay Fay Law Group, P.A. 777 Sixth Street, NW, Suite 410 Washington, DC 20001 Patrick M. Donahue The Donahue Law Firm, LLC 18 West Street Annapolis, MD 21401

Re: Peterson Fund – Assignment of Distributions – Uncashed Checks

#### Dear Counsel:

As you know, we represent Kenneth R. Feinberg, Successor Trustee (the "Trustee") of the Peterson §468B Qualified Settlement Fund (the "Fund"). As described in the motion (ECF No. 1059, the "Motion") filed by the Trustee on January 22, 2020 in *Peterson, et al. v. Islamic Republic of Iran, et al.*, Case No. 10-4518, U.S. District Court for the Southern District of New York (the "Peterson Case"), the Trustee has been making Pre-Final and Final Distributions and associated attorneys' fees.

Pursuant to an order (ECF No. 1070, the "Order") entered by the District Court, where the Trustee determines that one or more issues exist that may delay the Trustee's ability to timely remit payment of one or more of the distributions, the Trustee is authorized, among other things, to transfer and assign such distributions, which may include attorneys' fees and/or amounts owed to advance or funding companies, to a distribution agent designated by the relevant Plaintiff (a "Designated Distribution Agent") or to the lead attorney authorized to represent such Plaintiff in connection with the Peterson Case (the "Lead Litigation Attorney"), to be held in trust pending resolution of such issues.

The Order further provides that: (a) once such distributions have been transferred as provided in the Order, the Fund and the Trustee shall have no further liability for, or responsibility regarding, such distributions and (b) the transfer of such distributions to a Designated Distribution Agent or Lead Litigation Attorney shall not modify, limit or impair the rights of any Plaintiff, estate, attorney, advance company or other funding company, lender or other person or entity with respect to such distributions. Accordingly, a Designated Distribution Agent or Lead Litigation Attorney, as the case may be, is required to hold such distributions in a manner that does not modify, limit or impair

Caragh Fay Patrick M. Donahue March 23, 2021 Page 2

the rights of any Plaintiff, estate, attorney, Advance Company, other funding company, lender or other person or entity with respect to the Plaintiff's Delayed Distributions. <sup>1</sup>

The Trustee has determined that issues exist that are delaying his ability to timely remit payment of the distributions (the "Assigned Distributions") listed in the enclosed schedule (the "Schedule"). Specifically, the Plaintiffs listed in the Schedule have not received or have not cashed checks sent to them for the payments listed in the Schedule. Accordingly, the Trustee has canceled the checks and is remitting the Assigned Distributions to you as the Lead Litigation Attorneys for such Plaintiffs, as indicated in the Schedule, for further handling as you deem appropriate. Funds are being wired to Fay Law Group, P.A. and The Donahue Law Firm, LLC in the total amounts of the Assigned Distributions assigned to them, respectively, per instructions provided by Ms. Fay and Mr. Donahue.

Please acknowledge your receipt of this letter and check by signing where indicated below and returning a scan of the letter by email.

If you have any questions, or we can be of assistance, please let us know promptly.

Very truly yours,

Alan H. Katz

RECEIPT ACKNOWLEDGED:

**Enclosures** 

cc: Noel J. Nudelman

<sup>&</sup>lt;sup>1</sup> This letter summarizes the relevant provisions of the Order. We suggest that you review the provisions of the Order in their entirety.

<sup>&</sup>lt;sup>2</sup> The Trustee is designating Lead Litigation Attorneys only for the purpose of assigning payments as described herein and not for any other purpose.

				Lead Litigation			
Epiq	Plaintiff	Representative	Case	Attorney	Payment Type	An	nount
229			Peterson	Fay	Final Payment	\$	3,993.78
229			Peterson	Fay	Pre-Final Payment	\$	22,166.25
306			Peterson	Fay	Final Payment	\$	3,993.78
306			Peterson	Fay	Pre-Final Payment	\$	22,166.25
427			Peterson	Fay	Final Payment	\$	3,993.78
456			Peterson	Fay	Final Payment	\$	3,993.78
515			Peterson	Fay	Final Payment	\$	5,235.91
534			Peterson	Fay	Final Payment	\$	7,987.55
536			Peterson	Fay	Final Payment	\$	7,987.55
735			Peterson	Fay	Final Payment	\$	7,987.55
735			Peterson	Fay	Pre-Final Payment	\$	44,332.50
926			Davis	Fay	Final Payment	\$	3,993.78
926			Davis	Fay	Pre-Final Payment	\$	22,166.25
965			Davis	Fay	Final Payment	\$	2,396.27
1032			Davis	Fay	Final Payment	\$	1,357.88
1217			Brown	Fay	Final Payment	\$	7,987.55
1222			Brown	Fay	Final Payment	\$	798.76
1222			Brown	Fay	Pre-Final Payment	\$	4,433.25
1399			Worley	Fay	Final Payment	\$	798.76
					Subtotal	\$	177,771.18
1770			Valore	Donahue	Final Payment	\$	665.64
1770			Valore	Donahue	Pre-Final Payment	\$	1,377.42
					Subtotal	\$	2,043.06
					Total	\$	179,814.24

## EXHIBIT 7 (pt. 2)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT NEW YORK

	X	
DEBORAH D. PETERSON, Personal Representative of the Estate of James C. Knipple (Dec.), et al.,	: : : : :	
Plaintiffs,	:	Case No. 10 Civ. 4518 (LAP) CONSOLIDATED
V.	:	
ISLAMIC REPUBLIC OF IRAN, BANK MARKAZI a/k/a CENTRAL BANK OF IRAN	: : 1;:	
BANCA UBAE SpA; CITIBANK, N.A.; and CLEARSTREAM BANKING, S.A.	:	
Defendants.	:	
	X	

#### DECLARATION OF CHARLES MARR

- I, Charles Marr, declare as follows:
- 1. I am employed by Epiq Class Action & Claims Solutions, Inc. ("Epiq") as Project Director. I am providing this declaration concerning the sending of notices of assignments of Delayed Distributions to Lead Attorneys and Designated Distribution Agents.
- 2. On March 24, 2021, I caused notices (each a "Notice") to be sent by U.S. mail, first class postage prepaid, addressed to the Plaintiffs assigned the following tracking numbers at such Plaintiffs' last know addresses:

TN 229	TN 536	TN 1222	TN 1515
TN 306	TN 735	TN 1399	TN 1518
TN 427	TN 926	TN 1478	TN 1770
TN 456	TN 965	TN 1489	
TN 515	TN 1032	TN 1501	
TN 534	TN 1217	TN 1509	

3. Copies of the Notices were sent by email as follows:

For TN 229, TN 306, TN 427, TN 456, TN 515, TN 534, TN 536, TN 735, TN 926, TN 965, TN 1032, TN 1217, TN 1222 and TN 1399:

Lead Attorney: Caragh Fay caragh.fay@faylawgroup.com

For TN 1770:

Lead Attorney: Patrick M. Donahue pmd@wisedonahue.com

For TN 1478, TN 1489, TN 1501, TN 1509, TN 1515, and TN 1518:

Lead Attorney: Dale K. Cathell dale.cathell@dlapiper.com

For TN 1217 and TN 1222:

Noel J. Nudelman njnudelman@hnklaw.com

For TN 1770:

Carlos Fernandez Nadal carlosfernandez@cfnlaw.com

For TN 515, a copy of the Notice was sent by U.S. First-Class Mail to:

Estate counsel: G. Elliott Cobb, Jr. 506 N. Main Street Franklin, VA 23851

4. A specimen of the form of Notice is annexed hereto. The actual Notice sent to each Plaintiff included information specific to each Plaintiff's Delayed Distributions.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 24, 2021

Charles Marr, Esq., PMP

**Project Director** 

Epiq Class Action & Claims Solutions, Inc.

<b>SPECIMEN</b>
-----------------

Dear [insert Plaintiff's Name]:

March [], 2021	Tracking No
[insert Plaintiff's Name and Address]	

Pursuant to an Order entered by the U.S. District Court for the Southern District of New York (the "District Court") in Peterson, et al. v. Islamic Republic of Iran, et al., Case No. 10-4518 (the "Peterson Case"), Kenneth R. Feinberg, Successor Trustee (the "Trustee") of the Peterson §468B Qualified Settlement Fund (the "Fund"), has made final distributions from the assets of the Fund. The District Court's Order provides, in part, that where the Trustee determines that one or more issues exist that may delay the Trustee's ability to timely remit payment of one or more of the distributions, the Trustee is authorized, among other things, to transfer and assign such distributions to a Designated Distribution Agent designated by the relevant Plaintiff or to the lead attorney authorized to represent such Plaintiff in connection with the Peterson Case (the "Lead Attorney"), to be held in trust pending resolution of such issues. The Order further provides that, once the delayed distributions have been transferred as provided in the Order, the Fund and the Trustee shall have no further liability for, or responsibility regarding, such distributions.<sup>1</sup>

Checks sent to you for the following payments were not cashed in a timely manner and have now been canceled:

Pre-Final Distribution in the amount of \$[insert amount]. Final Distribution in the amount of \$[insert amount].

The Trustee has transferred the foregoing payment(s) to your Lead Attorney:

[insert Lead Attorney name, address and telephone number

For further information, please contact the Lead Attorney.

Sincerely,

Beirut Lawsuit Distribution Administrator

cc: [insert Lead Attorney name]
[insert estate counsel and/or other counsel names, as applicable]

91524590v.1

<sup>&</sup>lt;sup>1</sup> This letter's description of the District Court's Order is intended solely for informational purposes. The Trustee reserves all rights under the terms of the District Court's orders.

# EXHIBIT "8"

# EXHIBIT 8 (pt. 1)

#### AGREEMENT REGARDING FIFTH AND FINAL ATTORNEYS' FEES DISTRIBUTION

By signing below, I represent, acknowledge and agree as follows on behalf of myself, my law firm (if any, whether or not identified herein), and the partners, members and/or shareholders of my law firm and any and all predecessors thereof (if any, whether or not identified herein), all of which including myself are individually and collectively referred to herein as "Law Firm," with regard to the fifth and final distribution of attorneys' fees that Kenneth R. Feinberg, the Successor Trustee of the Peterson Fund (the "Trustee"), is to pay to Law Firm, whether made in cash and/or future periodic payments (the "Final Attorneys' Fees Distribution"). Should Law Firm's name appear on more than one line of Exhibits "H" and/or "M," attached hereto and made a part hereof, the terms of this Agreement shall apply to each of such lines.

- 1. Law Firm acknowledges previously receiving from the Trustee four interim distributions of attorneys' fees and reaffirms that all of the agreements and acknowledgments signed by Law Firm in connection with such payments were and remain accurate in every material respect.
- 2. Law Firm understands that the Trustee will distribute additional attorneys' fees, in cash and/or future periodic payments, in the amount of \$3,759,840 as shown on Exhibit "H" in the column "Total Proposed Distribution" (such distribution is hereafter referred to as the "Current Attorneys' Fees Distribution") and that pursuant to paragraphs 27 and 28 of the Order entered by the District Court (Hon. Loretta A. Preska) on or about February 28, 2020, the Trustee is assigning the total additional amount of \$175,009 of the Final Attorneys' Fees Distribution, as shown in the column labeled "Total" on Exhibit "M" (referred to as the "Assigned Fees"), on account of Plaintiff Supplemental Confidential Disbursement Authorizations ("SCDAs") and Plaintiff Final Confidential Disbursement Authorizations ("FCDAs") for which payment cannot be made at the present time due to some legal restriction.
- 3. Law Firm agrees that (i) the amount shown for Law Firm in the column of Exhibit "H" labeled "Total Proposed Distribution" (such amount is hereafter referred to as "Law Firm's Share") represents the correct calculation of Law Firm's fees and is its correct share of the Current Attorneys' Fees Distribution, (ii) Law Firm shall have no claim against the Trustee or the Peterson Fund concerning the Current Attorneys' Fees Distribution for any amount in excess of Law Firm's Share, and (iii) the percentage for Law Firm shown in the column of Exhibit "J" labeled "Ratio" is correct for purposes of the Final Attorneys' Fees Distribution.
- 4. Law Firm acknowledges that (i) the Final Attorneys' Fees Distribution, including the Current Attorneys' Fees Distribution and the Assigned Fees, is the last and final payment of attorneys' fees that Law Firm will receive from the Peterson Fund and/or the Trustee in connection with the Peterson cases, (ii) that Law Firm shall have no further claim against the Peterson Fund or Trustee with respect to any additional fees or expenses and (iii) that neither the Peterson Fund nor the Trustee shall have any responsibility or liability with respect to the Assigned Fees.
- 5. Law Firm has provided to the Trustee in writing all information of which Law Firm has knowledge with respect to (i) any and all loans, advances or assignments taken, received or made by Law Firm against Law Firm's attorneys' fees and (ii) any liens or other rights that may limit Law Firm's right to be paid attorneys' fees. To the extent that Law Firm

has taken or received a loan or advance against, or made an assignment of, attorneys' fees in this case or there is any restriction on payment of Law Firm's attorneys' fees as a result of any such loan or advance, Law Firm hereby authorizes the Trustee to contact any lender, assignee or other person and make arrangements for payment and make payment in accordance with such lender's, assignee's or other person's instructions.

- 6. Nothing contained in this Agreement shall prejudice the rights, if any, that any signatory may have against any other signatory.
- 7. Notwithstanding the presence of signature lines for others on this Agreement, this Agreement shall be a separate agreement by Law Firm in favor of the Trustee, effective as to Law Firm, whether executed by others or not.

SALON MARROW DYCKMAN NEWMAN & BROUDY LLC	FAY LAW GROUP, P.A.
	BY:
BY:	Thomas Fortune Fay
Liviu Vogel	Date:, 2021
Date:, 2021	
	BY:
FLEISCHMAN BONNER & ROCCO LLP	Caragh Fay
	Date:, 2021
BY:	PERLES LAW FIRM
James P. Bonner	
Date:, 2021	BY:
	Steven R. Perles
STONE LAW GROUP PLLC	Date:, 2021
BY:	HEIDEMAN NUDELMAN & KALIK, P.C.
Ralph M. Stone	
Date:, 2021	BY:
	Richard D. Heideman
FLEISCHMAN LAW FIRM	Noel J. Nudelman
	Tracy R. Kalik
BY:	Date:, 2021
Keith M. Fleischman	
Date:, 2021	DANIEL W. GASKILL
	BY:
	Daniel W. Gaskill
	Date:, 2021

WISE & DONAHUE, PLC and	BOND & NORMAN, PLLC
PATRICK M. DONAHUE, individually	
	BY:
BY:	Jane Carol Norman
Patrick M. Donahue	Date:, 2021
Date:, 2021	·
	BY:
JOSEPH PETER DRENNAN	Ferris Bond
	Date:, 2021
BY:	
Joseph Peter Drennan	ALAN J. NUTA
Date:, 2021	
·	BY:
ANTHONY J. LASPADA, PA	Alan J. Nuta
	Date:, 2021
BY:	
Anthony J. LaSpada	CHARLES C. PARSONS
Date:, 2021	
	BY:
THE ROTHENBERG LAW FIRM, LLP	Charles C. Parsons
	Date:, 2021
BY:	
Allen L. Rothenberg	ESTATE OF BARBARA PATTIN
Date:, 2021	
	BY:
KARR & ALLISON, PC	
	Date:, 2021
BY:	
Theodore S. Allison	ESTATE OF DONALD A. CLOWER
Date:, 2021	
	BY:
FREDRIC J. EINHORN	Hannalore U. Mayer
	Personal Representative
BY:	Date:, 2021
Fredric J. Einhorn	
Date:, 2021	ESTATE OF ROBERT P. FEENEY
TUNA MECIT	BY:
	Alan J. Nuta, Personal Representative
BY:	Date:, 2021
Tuna Mecit	
Date:, 2021	

**EXHIBIT H** 

PETERSON FUND

FIFTH/FINAL ATTORNEY FEE DISTRIBUTION

# PRIVILEGED & CONFIDENTIAL

	FINAL ATTORNEY FEES (EXHIBIT J)		SCDA HOLDBACKS RELEASED (EXHIBIT K)		PRE-FINAL HOLDBACKS RELEASED (EXHIBIT L)	DIS	TOTAL PROPOSED STRIBUTION
NY ATTORNEYS:							
SALON MARROW	\$ 329,856	\$	3,258	\$	33,470	\$	366,584
BONNER	141,987		1,179		14,757		157,923
FLEISCHMAN	23,927		757		1,611		26,296
TOTAL NY ATTORNEY FEES	\$ 495,770	\$	5,195	\$	49,838	\$	550,803
ROTHENBERG	\$ 368,412	\$	10,461	\$	37,023	\$	415,896
LASPADA	95,476		-		12,317		107,793
FAY	56,704		-		7,315		64,019
PERLES	56,704		-		7,315		64,019
TOTAL	\$ 577,295	\$	10,461	\$	63,971	\$	651,727
FAY	861,043		3,732		90,881	\$	955,656
PERLES	861,043		3,732		90,881		955,656
GASKILL	42,176		1,799		(1,338)		42,637
KARR	14,551		-		1,877		16,428
HNK	216,872		4,123		23,962		244,957
DRENNAN	70,709		1,799		2,343		74,851
DONAHUE TOTAL	\$ 2,131,043	\$	1,799 16,984	\$	1,561 210,167	\$	68,010 2,358,194
TOTAL	2,131,043	Y	10,504	Ţ	210,107	Ţ	2,330,134
DAMAGES ATTORNEYS:							
BOND	\$ 12,648	\$	-	\$	1,632	\$	14,280
CLOWER	12,630		_		1,629		14,259
DRENNAN	17,016		_		930		17,947
EINHORN	8,522		_		1,099		9,622
FEENEY	18,827		_		2,429		21,256
GASKILL	17,432		_		2,249		19,681
KARR	11,081		_		165		11,245
LASPADA	23,575		_		3,041		26,616
MECIT	8,327		779		(191)		8,915
NORMAN	17,091		-		2,205		19,296
NUTA	14,178		_		1,829		16,007
PARSONS	5,094				657		5,752
PATTIN	12,612		_		1,627		14,239
TOTAL DAMAGES ATTY FEES	\$ 179,034	\$	779	\$	19,303	\$	199,115
TO THE DIMINIOLD ATTITLES	7 175,034	٦	,,,,	Ţ	10,000	Ţ	155,115
TOTAL ATTORNEY FEES	\$ 3,383,142	\$	33,419	\$	343,279	\$	3,759,840

EXHIBIT J

PETERSON FUND

FINAL ATTORNEY FEE DISTRIBUTION

# **PRIVILEGED & CONFIDENTIAL**

			PROPOSED		
	TOTAL ATTORNEY		CURRENT DISTRIBUTION:		
	FEES PER		FINAL	LESS:	NET
	C FAY, ESQ'S		TOTAL	AMOUNTS	PROPOSED
<b>ATTORNEY</b>	12/20/17 SPREADSHEET <sup>1</sup>	<u>RATIO</u>	ATTORNEY FEES	ASSIGNED <sup>2</sup>	DISTRIBUTION
NY ATTORNEYS:					
SALON MARROW	\$ 53,659,075	9.7500000%	\$ 332,438	\$ (2,582)	\$ 329,856
BONNER	23,081,532	4.1939771%	142,999	(1,012)	141,987
FLEISCHMAN	3,929,789	0.7140534%	24,347	(419)	23,927
TOTAL NY ATTORNEY FEES	\$ 80,670,396	14.6580305%	\$ 499,783	\$ (4,013)	\$ 495,770
ROTHENBERG	\$ 59,947,508	10.8926254%	\$ 371,397	\$ (2,985)	\$ 368,412
LASPADA	15,410,817	2.8001874%	95,476	-	95,476
FAY	9,152,594	1.6630513%	56,704	-	56,704
PERLES	9,152,594	1.6630513%	56,704	-	56,704
TOTAL	\$ 93,663,513	17.0189153%	\$ 580,281	\$ (2,985)	\$ 577,295
FAY	139,908,134	25.4216889%	866,783	(5,741)	861,043
PERLES	139,908,134	25.4216889%	866,783	(5,741)	861,043
GASKILL	7,118,610	1.2934709%	44,102	(1,926)	42,176
KARR	2,348,610	0.4267488%	14,551	-	14,551
HNK	35,189,736	6.3940708%	218,014	(1,142)	216,872
DRENNAN DONAHUE	11,724,174 10,746,172	2.1303143% 1.9526087%	72,636 66,577	(1,926) (1,926)	70,709 64,650
TOTAL	\$ 346,943,571	63.0405912%			
TOTAL	3 10,3 13,371	03.0 10331270	2,113,113	Ų (10,102)	φ 2,131,013
DAMAGES ATTORNEYS:					
BOND	\$ 2,041,550	0.3709552%	\$ 12,648	\$ -	\$ 12,648
CLOWER	2,038,586	0.3704166%	12,630	-	12,630
DRENNAN	2,804,624	0.5096079%	17,376	(359)	17,016
EINHORN	1,375,578	0.2499462%	8,522	-	8,522
FEENEY	3,038,948	0.5521851%	18,827	-	18,827
GASKILL	2,813,730	0.5112623%	17,432	-	17,432
KARR	1,846,566	0.3355261%	11,440	(359)	11,081
LASPADA	3,805,184	0.6914123%	23,575	-	23,575
MECIT	1,402,071	0.2547601%	8,686	(359)	8,327
NORMAN	2,758,693	0.5012619%	17,091	-	17,091
NUTA	2,288,525	0.4158313%	14,178	-	14,178
PARSONS	822,281	0.1494106%	5,094	-	5,094
PATTIN	2,035,673	0.3698873%	12,612	_	12,612
TOTAL DAMAGES ATTY FEES	\$ 29,072,008	5.2824630%		\$ (1,078)	
TOTAL ATTORNEY FEES	\$ 550,349,488	100.0000000%	\$ 3,409,621	\$ (26,479)	\$ 3,383,142
TOTAL ATTORNET FEES	550,545,488	100.00000000%	3,403,621	(20,479) د	3,363,142

## NOTES:

 $<sup>^{1}\</sup>text{C}$  Fay, Esq's calculation does not take into account any reserves, expenses or deductions.

<sup>&</sup>lt;sup>2</sup>The assigned amounts will be turned over as provided in the Court's 2/28/20 order.

**EXHIBIT K** 

PETERSON FUND

ATTORNEY FEE DISTRIBUTION- REMAINDER OF AMOUNTS FROM SCDAS

#### PRIVILEGED AND CONFIDENTIAL

	REMAINING		
	HOLDBACK AFTER		
	FOURTH	LESS:	NET
	INTERIM	AMOUNTS	PROPOSED
<u>ATTORNEY</u>	DISTRIBUTION	<u>ASSIGNED</u>	<b>DISTRIBUTIONS</b>
NY ATTORNEYS:			
SALON MARROW	\$ 8,322	\$ (5,063)	\$ 3,258
BONNER	3,516	(2,337)	1,179
FLEISCHMAN	757	-	757
TOTAL NY ATTORNEY FEES	\$ 12,595	\$ (7,400)	\$ 5,195
ROTHENBERG	\$ 17,842	\$ (7,381)	\$ 10,461
LASPADA	_	-	_
FAY			_
PERLES			_
TOTAL	\$ 17,842	\$ (7,381)	\$ 10,461
	Ψ 17,0.1	(1)302)	Ψ 10,101
FAY	\$ 21,009	\$ (17,277)	\$ 3,732
PERLES	21,009	(17,277)	3,732
GASKILL	1,799	(17,277)	1,799
KARR	-	_	-
HNK	4,123	-	4,123
DRENNAN	1,799	-	1,799
DONAHUE	1,799	-	1,799
TOTAL	\$ 51,537	\$ (34,553)	\$ 16,984
DAMAGES ATTORNEYS:			
BOND	\$ -	\$ -	\$ -
CLOWER	-	-	-
DRENNAN	2,597	(2,597)	-
EINHORN	-	-	-
FEENEY	-	-	-
GASKILL	-	-	-
KARR	-	-	-
LASPADA	-	-	-
MECIT	779	-	779
NORMAN	-	-	-
NUTA	-	-	-
PARSONS	-	<u>-</u>	-
PATTIN	-	<u>-</u>	-
TOTAL DAMAGES ATTY FEES	\$ 3,376	\$ (2,597)	\$ 779
TOTAL ATTORNEY FEES	\$ 85,350	\$ (51,931)	\$ 33,419
IOTAL ATTOMILITIES	9 65,330	7 (31,331)	7 33,413

#### NOTES:

Amounts being assigned are for FCDAs with estate or other legal issues as of 1/27/21.

**EXHIBIT L** 

PETERSON FUND

ATTORNEY FEE DISTRIBUTION- REMAINDER OF AMOUNTS FROM FCDAS-PRE-FINAL DISTRIBUTION

#### PRIVILEGED AND CONFIDENTIAL

	REMAINING		
	HOLDBACK AFTER		
	FOURTH	<u>LESS:</u>	NET
	INTERIM	AMOUNTS	PROPOSED
<u>ATTORNEY</u>	DISTRIBUTION	<u>ASSIGNED</u>	DISTRIBUTIONS
NY ATTORNEYS:			
SALON MARROW	\$ 42,888	\$ (9,418)	\$ 33,470
BONNER	18,448	(3,691)	14,757
FLEISCHMAN	3,141	(1,530)	1,611
TOTAL NY ATTORNEY FEES	\$ 64,477	\$ (14,640)	\$ 49,838
ROTHENBERG	\$ 47,914	\$ (10,891)	\$ 37,023
LASPADA	12,317	-	12,317
FAY	7,315	-	7,315
PERLES	7,315	-	7,315
TOTAL	\$ 74,862	\$ (10,891)	
FAY	\$ 111,824	\$ (20,943)	\$ 90,881
PERLES	111,824	(20,943)	90,881
GASKILL	5,690	(7,028)	(1,338)
KARR	1,877	- 1	1,877
HNK	28,126	(4,165)	23,962
DRENNAN	9,371	(7,028)	2,343
DONAHUE	8,589	(7,028)	1,561
TOTAL	\$ 277,302	\$ (67,134)	\$ 210,167
DAMAGES ATTORNEYS:			
BOND	\$ 1,632	\$ -	\$ 1,632
CLOWER	1,629	· -	1,629
DRENNAN	2,242	(1,311)	930
EINHORN	1,099	(1,511)	1,099
FEENEY	2,429	_	2,429
GASKILL	2,249	_	2,249
KARR	1,476	(1,311)	165
LASPADA	3,041	(1,311)	3,041
MECIT	1,121	(1,311)	(191)
NORMAN	2,205	(1,311)	2,205
	· ·	-	
NUTA	1,829		1,829
PARSONS	657	-	657
PATTIN	1,627	ć (2.024)	1,627
TOTAL DAMAGES ATTY FEES	\$ 23,236	\$ (3,934)	\$ 19,303
TOTAL ATTORNEY FEES	\$ 439,878	\$ (96,599)	\$ 343,279

#### NOTES:

Amounts being assigned are for FCDAs with estate or other legal issues as of 1/27/21.

**EXHIBIT M** 

PETERSON FUND

ATTORNEY FEE DISTRIBUTION- AMOUNTS ASSIGNED

#### PRIVILEGED AND CONFIDENTIAL

		AMOU	NTS	ASSIGNED	FR	OM:		
<u>ATTORNEY</u>	5	CDAS	PF	RE-FINAL		FINAL		<u>TOTAL</u>
NY ATTORNEYS:								
SALON MARROW	\$	5,063	\$	9,418	\$	2,582	\$	17,063
BONNER		2,337		3,691		1,012		7,040
FLEISCHMAN		-		1,530		419		1,949
TOTAL NY ATTORNEY FEES	\$	7,400	\$	14,640	\$	4,013	\$	26,053
ROTHENBERG	\$	7,381	\$	10,891	\$	2,985	\$	21,257
LASPADA		-		-		-		-
FAY		-		-		-		-
PERLES		-		-		-		-
TOTAL	\$	7,381	\$	10,891	\$	2,985	\$	21,257
FAV		47.077		20.042		44	_	42.064
FAY	\$	17,277	\$	20,943	\$	5,741	\$	43,961
PERLES		17,277		20,943		5,741		43,961
GASKILL		-		7,028		1,926		8,954
KARR		-		-		-		-
HNK		-		4,165		1,142		5,306
DRENNAN		-		7,028		1,926		8,954
DONAHUE		-		7,028		1,926		8,954
TOTAL	\$	34,553	\$	67,134	\$	18,402	\$	120,090
DAMAGES ATTORNEYS:	\$		\$		\$		\$	
BOND	Ş	-	Ş	-	Ą	-	Ą	-
		-		-		-		-
CLOWER		2 507		1 211		- 250		4 207
DRENNAN		2,597		1,311		359		4,267
EINHORN		-		-		-		-
FEENEY		-		-		-		-
GASKILL		-		-		-		-
KARR		-		1,311		359		1,671
LASPADA		-				-		
MECIT		-		1,311		359		1,671
NORMAN		-		-		-		-
NUTA		-		-		-		-
PARSONS		-		-		-		-
PATTIN		-		-		-		-
TOTAL DAMAGES ATTY FEES	\$	2,597	\$	3,934	\$	1,078	\$	7,609
TOTAL ATTORNEY FEES	\$	51,931	\$	96,599	\$	26,479	\$	175,009
	7	32,331	7	30,000	7	_0,	7	0,000

## **NOTES:**

Amounts being assigned are for FCDAs with estate or other legal issues as of 1/27/21.

# PETERSON CALCULATION OF ATTORNEY FEES FROM SCDAs THAT ARE BEING ASSIGNED

# PRIVILEGED AND CONFIDENTIAL

		ATTORNEY	SALON MARROW	BONNER	FLEISCHMAN	DAMAGES	DAMAGES	REFERRAL	REFERRAL	PLAINTIFF					
Epiq TN Name	Case	FEE	<u>FEE</u>	<u>FEE</u>	<u>FEE</u>	ATTY FEE	<b>ATTORNEY</b>	ATTY FEE	<b>ATTORNEY</b>	<u>ATTORNEYS</u>	<u>F&amp;P</u>	<u>HNK</u>	<b>GASKILL</b>	DRENNAN	DONAHUE
424	Peterson	\$28,850.65	\$ 2,812.94	\$ 1,298.28	\$ -	\$ 2,596.56	Drennan	\$ 7,380.96	ROTHENBERG	\$ 14,761.91	\$ 14,761.91	\$ -	\$ -	\$ -	\$ -
925	Davis	\$14,425.32	\$ 1,406.47	\$ 649.14	\$ -			\$ -	\$ -	\$ 12,369.71	\$ 12,369.71	\$ -	\$ -	\$ -	\$ -
1397	Worley	\$8,655.19	\$ 843.88	\$ 389.48	\$ -			\$ -	\$ -	\$ 7,421.83	\$ 7,421.83	\$ -	\$ -	\$ -	\$ -
TOTAL		\$ 51,931.16	\$ 5,063.29	\$ 2,336.90	\$ -	\$ 2,596.56	_	\$ 7,380.96	_	\$ 34,553.46	\$ 34,553.46	\$ -	\$ -	\$ -	\$ -

PETERSON
CALCULATION OF ATTORNEY FEES FROM PRE-FINAL DISTRIBUTIONS THAT ARE BEING ASSIGNED

PRIVILEGED AND CONFIDENTIAL										NET TO					
		PRE-FINAL ATTY	SALON MARROW	BONNER	FLEISCHMAN	DAMAGES	DAMAGES	REFERRAL	REFERRAL	PLAINTIFF					
Epiq TN Name	Case	FEE ASSIGNED	<u>FEE</u>	<u>FEE</u>	<u>FEE</u>	ATTY FEE	<b>ATTORNEY</b>	ATTY FEE	<b>ATTORNEY</b>	<b>ATTORNEYS</b>	<u>F&amp;P</u>	<u>HNK</u>	GASKILL	<u>DRENNAN</u>	DONAHUE
343	Peterson	\$7,284.98	\$ 710.29	\$ 327.82		\$ 655.65	Mecit	\$ 1,863.74	ROTHENBERO	\$ 3,727.48	\$ 3,727.48				
424	Peterson	\$14,569.97	\$ 1,420.57	\$ 655.65		\$ 1,311.30	Drennan	\$ 3,727.48	ROTHENBERG	\$ 7,454.97	\$ 7,454.97				
592	Peterson	\$7,284.98	\$ 710.29	\$ 327.82		\$ 655.65	Mecit	\$ 1,863.74	ROTHENBERG	\$ 3,727.48	\$ 3,727.48				
839	Valore	\$14,569.97	\$ 1,420.57		\$ 1,529.85	\$ 1,311.30	Karr	\$ 3,436.08	ROTHENBERG	\$ 6,872.17	\$ 1,718.04		\$1,718.04	\$1,718.04	\$1,718.04
925	Davis	\$7,284.98	\$ 710.29	\$ 327.82						\$ 6,246.87	\$ 6,246.87				
996	Davis	\$1,894.10	\$ 184.67	\$ 85.23						\$ 1,624.19	\$ 1,624.19				
1061	Davis	\$7,284.98	\$ 710.29	\$ 327.82						\$ 6,246.87	\$ 6,246.87				
1120	Taylor	\$14,569.97	\$ 1,420.57	\$ 655.65						\$ 12,493.75	\$ 3,123.44		\$3,123.44	\$3,123.44	\$3,123.44
1308	Bland	\$7,284.98	\$ 710.29	\$ 327.82						\$ 6,246.87	\$ 2,082.29	\$4,164.58			
1363	Spencer	\$10,198.98	\$ 994.40	\$ 458.95						\$ 8,745.62	\$ 2,186.41		\$2,186.41	\$2,186.41	\$2,186.41
1397	Worley	\$4,370.99	\$ 426.17	\$ 196.69						\$ 3,748.12	\$ 3,748.12				
TOTAL		\$96,598.89	\$ 9,418.39	\$ 3,691.30	\$ 1,529.85	\$ 3,933.89		\$ 10,891.05		\$ 67,134.41	\$ 41,886.17	\$4,164.58	\$7,027.88	\$7,027.88	\$7,027.88

PETERSON
CALCULATION OF ATTORNEY FEES FROM FINAL DISTRIBUTIONS THAT ARE BEING ASSIGNED

PRIVILEGED AND CONFIDENTIAL										NET TO					
		FINAL ATTY	SALON MARROW	BONNER	FLEISCHMAN	DAMAGES	DAMAGES	REFERRAL	REFERRAL	PLAINTIFF					
Epiq TN Name	Case	FEE ASSIGNED	<u>FEE</u>	<u>FEE</u>	<u>FEE</u>	ATTY FEE	<b>ATTORNEY</b>	ATTY FEE	<b>ATTORNEY</b>	<b>ATTORNEYS</b>	F&P	<u>HNK</u>	GASKILL	<u>DRENNAN</u>	DONAHUE
343	Peterson	\$1,996.89	\$ 194.70	\$ 89.86		\$ 179.72	Mecit	\$ 510.87	ROTHENBER	\$ 1,021.74	\$ 1,021.74				
424	Peterson	\$3,993.78	\$ 389.39	\$ 179.72		\$ 359.44	Drennan	\$ 1,021.74	ROTHENBERG	\$ 2,043.48	\$ 2,043.48				
592	Peterson	\$1,996.89	\$ 194.70	\$ 89.86		\$ 179.72	Mecit	\$ 510.87	ROTHENBERG	\$ 1,021.74	\$ 1,021.74				
839	Valore	\$3,993.78	\$ 389.39		\$ 419.35	\$ 359.44	Karr	\$ 941.87	ROTHENBERG	\$ 1,883.73	\$ 470.93		\$ 470.93	\$ 470.93	\$ 470.93
925	Davis	\$1,996.89	\$ 194.70	\$ 89.86						\$ 1,712.33	\$ 1,712.33				
996	Davis	\$519.19	\$ 50.62	\$ 23.36						\$ 445.21	\$ 445.21				
1061	Davis	\$1,996.89	\$ 194.70	\$ 89.86						\$ 1,712.33	\$ 1,712.33				
1120	Taylor	\$3,993.78	\$ 389.39	\$ 179.72						\$ 3,424.66	\$ 856.17		\$ 856.17	\$ 856.17	\$ 856.17
1308	Bland	\$1,996.89	\$ 194.70	\$ 89.86						\$ 1,712.33	\$ 570.78	\$1,141.55			
1363	Spencer	\$2,795.64	\$ 272.58	\$ 125.80						\$ 2,397.26	\$ 599.32		\$ 599.32	\$ 599.32	\$ 599.32
1397	Worley	\$1,198.13	\$ 116.82	\$ 53.92						\$ 1,027.40	\$ 1,027.40				
					-				'		-				
TOTAL		\$26,478.74	\$ 2,581.68	\$ 1,011.82	\$ 419.35	\$ 1,078.32		\$ 2,985.35		\$ 18,402.22	\$ 11,481.43	\$1,141.55	\$1,926.41	\$1,926.41	\$1,926.41



# EXHIBIT 8 (pt. 2)

Brookfield Place, 200 Vesey Street 20th Floor New York, NY 10281-2101 Telephone: 212-415-8600 Fax: 212-303-2754 www.lockelord.com

Alan H. Katz Direct Telephone: 212-415-8509 Direct Fax: 212-812-8380 akatz@lockelord.com

March 3, 2021

## By E-Mail:

Caragh Fay Fay Law Group, P.A. 777 Sixth Street, NW, Suite 410 Washington, DC 20001

Patrick M. Donahue The Donahue Law Firm, LLC 18 West Street Annapolis, MD 21401

Joseph Peter Drennan Attorney at Law 218 North Lee Street Alexandria, VA 22314-2631 Dan Gaskill The Law Office of Dan Gaskill, LLC 13525 Winding Trail Court Silver Spring, MD 20906

Steven R. Perles The Perles Law Firm, P.C. 1050 Connecticut Ave., N.W. Suite 500 Washington, DC 20036

Re: Peterson Fund – Revised Exhibits and Revised Schedule

#### Dear Counsel:

As we have advised, the exhibits to the Agreement Regarding Fifth and Final Attorneys' Fees Distribution (the "Agreement") that we sent on February 19, 2021 and the schedule included with our February 22, 2021 letter (the "Assignment Letter") concerning assignment of delayed distributions contained a misallocation regarding delayed distribution amounts assigned on account of one Plaintiff, and Final Attorneys' fees assigned on account of the Total Proposed Distributions (defined in the Assignment Letter) of the Fay Law Group, P.A. and The Perles Law Firm, P.C., one-half each. Instead, it was allocated to and, therefore, withheld in the calculation of the Total Proposed Distributions of The Donahue Law Firm, LLC, Joseph Peter Drennan and The Law Office of Dan Gaskill, LLC, one-third each.

Attached to this letter as Attachments 1 and 2 are a revised set of exhibits (the "Revised Exhibits") for the Agreement and a revised schedule (the "Revised Schedule") for the Assignment Letter.

Caragh Fay
Patrick M. Donahue
Joseph Peter Drennan
Dan Gaskill
Steven R. Perles
March 3, 2021
Page 2

Please return a copy of this letter signed below to indicate your agreement to substitute the Revised Exhibits and the Revised Schedule for the originals that were included with the Agreement and the Assignment Letter.

If you have any questions or comments, please let us know promptly.

Very truly yours,

Alan H. Katz

AGREED:

Print Name: \_\_\_\_\_\_, 2021

Attachments

cc (by e-mail, w/ encls.): Geoffrey T. Hervey

**EXHIBIT H** 

PETERSON FUND

FIFTH/FINAL ATTORNEY FEE DISTRIBUTION

# PRIVILEGED & CONFIDENTIAL

	FINAL ATTORNEY FEES (EXHIBIT J)		SCDA HOLDBACKS RELEASED (EXHIBIT K)		PRE-FINAL HOLDBACKS RELEASED (EXHIBIT L)	<u>DI</u> !	TOTAL PROPOSED STRIBUTION
NY ATTORNEYS: SALON MARROW	\$ 329,856	\$	3,258	\$	33,470	\$	366,584
BONNER	141,987	Ą	1,179	Ş	14,757	Ş	157,923
FLEISCHMAN	23,927		757		1,611		26,296
TOTAL NY ATTORNEY FEES	\$ 495,770	\$	5,195	\$	49,838	\$	550,803
TOTAL NY ATTORNEY FEES	Ş 495,770	Ş	5,195	Ş	49,030	Ş	330,603
ROTHENBERG	\$ 368,412	\$	10,461	\$	37,023	\$	415,896
LASPADA	95,476		-		12,317		107,793
FAY	56,704		-		7,315		64,019
PERLES	56,704		-		7,315		64,019
TOTAL	\$ 577,295	\$	10,461	\$	63,971	\$	651,727
FAY	860,336		3,732		88,304	\$	952,373
PERLES	860,336		3,732		88,304		952,373
GASKILL	42,647		1,799		380		44,826
KARR	14,551		-		1,877		16,428
HNK	216,872		4,123		23,962		244,957
DRENNAN	71,180		1,799		4,061		77,040
DONAHUE TOTAL	\$ 2,131,043	\$	1,799 16,984	\$	3,279 210,167	\$	70,199 2,358,194
TOTAL	2,131,043	٦	10,364	ڔ	210,107	Ų	2,330,134
DAMAGES ATTORNEYS:							
BOND	\$ 12,648	\$	-	\$	1,632	\$	14,280
CLOWER	12,630		-		1,629		14,259
DRENNAN	17,016		-		930		17,947
EINHORN	8,522		-		1,099		9,622
FEENEY	18,827		-		2,429		21,256
GASKILL	17,432		-		2,249		19,681
KARR	11,081		-		165		11,245
LASPADA	23,575		-		3,041		26,616
MECIT	8,327		779		(191)		8,915
NORMAN	17,091		-		2,205		19,296
NUTA	14,178		-		1,829		16,007
PARSONS	5,094		-		657		5,752
PATTIN	12,612		-		1,627		14,239
TOTAL DAMAGES ATTY FEES	\$ 179,034	\$	779	\$	19,303	\$	199,115
TOTAL ATTORNEY FEES	\$ 3,383,142	\$	33,419	\$	343,279	\$	3,759,840

EXHIBIT J

PETERSON FUND

FINAL ATTORNEY FEE DISTRIBUTION

## **PRIVILEGED & CONFIDENTIAL**

				PROPOSEI				
	TOTAL ATTO	DNEV		CURRENT DISTRIBUTION				
		S PER		FINA		LESS:		NET
	C FAY,			TOTA		AMOUNTS		PROPOSED
<u>ATTORNEY</u>	12/20/17 SPREADS	•	RATIO	ATTORNEY FEE		SSIGNED <sup>2</sup>	DI	STRIBUTION
ATTORNET	12/20/17 SFREADS	IILLI .	KATIO	ATTORNET FEE	2 ^	SSIGIVED	<u>DI.</u>	STRIBUTION
NY ATTORNEYS:								
SALON MARROW	\$ 53,65	9.075	9.7500000%	\$ 332,438	Ś	(2,582)	\$	329,856
BONNER	23,08		4.1939771%	142,999		(1,012)	7	141,987
FLEISCHMAN		•	0.7140534%	24,347		(419)		23,927
TOTAL NY ATTORNEY FEES	\$ 80,67		4.6580305%			(4,013)	ς .	495,770
TO THE TAT POINTED THE	Ç 00,07	0,330 1	1.030030370	133,700	Ť	(1,013)	7	133,770
ROTHENBERG	\$ 59,94	7.508 1	0.8926254%	\$ 371,397	Ś	(2,985)	Ś	368,412
LASPADA	15,41	•	2.8001874%	95,476		-	•	95,476
FAY			1.6630513%	56,704		_		56,704
PERLES			1.6630513%	56,704		_		56,704
TOTAL	\$ 93,66		7.0189153%			(2,985)	\$	577,295
	,	-,		,	ľ	( )/	•	,
FAY	139,90	8,134 2	5.4216889%	866,783		(6,447)		860,336
PERLES	139,90		5.4216889%	866,783		(6,447)		860,336
GASKILL		,	1.2934709%	44,102		(1,455)		42,647
KARR	2,34	8,610	0.4267488%	14,551		-		14,551
HNK	35,18	9,736	<mark>6.3940708%</mark>	218,014		(1,142)		216,872
DRENNAN	11,72		2.1303143%	72,636		(1,455)		71,180
DONAHUE	10,74		1.9526087%	66,577		(1,455)		65,121
TOTAL	\$ 346,94	3,571 6	3.0405912%	\$ 2,149,445	\$	(18,402)	\$	2,131,043
DAMAGES ATTORNEYS:								
BOND	\$ 2,04	1,550	0.3709552%	\$ 12,648	\$	-	\$	12,648
CLOWER			0.3704166%	12,630		-	·	12,630
DRENNAN			0.5096079%	17,376		(359)		17,016
EINHORN			0.2499462%	8,522		- '		8,522
FEENEY			0.5521851%	18,827		-		18,827
GASKILL			0.5112623%	17,432		-		17,432
KARR	1,84		0.3355261%	11,440		(359)		11,081
LASPADA	3,80	5,184	0.6914123%	23,575		- 1		23,575
MECIT			0.2547601%	8,686		(359)		8,327
NORMAN			0.5012619%	17,091		- 1		17,091
NUTA			0.4158313%	14,178		-		14,178
PARSONS			0.1494106%	5,094		-		5,094
PATTIN			0.3698873%	12,612		_		12,612
TOTAL DAMAGES ATTY FEES	\$ 29,07		5.2824630%			(1,078)	\$	179,034
TOTAL ATTORNEY FEES	\$ 550,34	9,488 10	0.0000000%	\$ 3,409,621	\$	(26,479)	\$	3,383,142

## NOTES:

 $<sup>^{1}\</sup>text{C}$  Fay, Esq's calculation does not take into account any reserves, expenses or deductions.

<sup>&</sup>lt;sup>2</sup>The assigned amounts will be turned over as provided in the Court's 2/28/20 order.

**EXHIBIT K** 

PETERSON FUND

ATTORNEY FEE DISTRIBUTION- REMAINDER OF AMOUNTS FROM SCDAS

#### PRIVILEGED AND CONFIDENTIAL

<u>ATTORNEY</u>	REMAINING HOLDBACK AFTER FOURTH INTERIM DISTRIBUTION	<u>LESS:</u> AMOUNTS <u>ASSIGNED</u>	NET PROPOSED <u>DISTRIBUTIONS</u>
NY ATTORNEYS:			
SALON MARROW	\$ 8,322	\$ (5,063)	\$ 3,258
BONNER	3,516	(2,337)	1,179
FLEISCHMAN	757	-	757
TOTAL NY ATTORNEY FEES	\$ 12,595	\$ (7,400)	\$ 5,195
ROTHENBERG	\$ 17,842	\$ (7,381)	\$ 10,461
LASPADA	· · · · · · · · · · · · · · · · · · ·	-	· -
FAY			_
PERLES			<u>-</u>
TOTAL	\$ 17,842	\$ (7,381)	\$ 10,461
	,	( / /	,
FAY	\$ 21,009	\$ (17,277)	\$ 3,732
PERLES	21,009	(17,277)	3,732
GASKILL	1,799	-	1,799
KARR	-	-	-
HNK	4,123	-	4,123
DRENNAN	1,799	-	1,799
DONAHUE	1,799	- (24.552)	1,799
TOTAL	\$ 51,537	\$ (34,553)	\$ 16,984
DAMAGES ATTORNEYS:			
BOND	\$ -	\$ -	\$ -
CLOWER	-	-	-
DRENNAN	2,597	(2,597)	-
EINHORN	-	-	-
FEENEY	-	-	-
GASKILL	-	-	-
KARR	-	-	-
LASPADA	-	-	-
MECIT	779	-	779
NORMAN	-	-	-
NUTA	-	-	-
PARSONS	-	-	-
PATTIN	-	-	-
TOTAL DAMAGES ATTY FEES	\$ 3,376	\$ (2,597)	\$ 779
TOTAL ATTORNEY FEES	\$ 85,350	\$ (51,931)	\$ 33,419

## NOTES:

Amounts being assigned are for FCDAs with estate or other legal issues as of 1/27/21.

**EXHIBIT L** 

PETERSON FUND

ATTORNEY FEE DISTRIBUTION- REMAINDER OF AMOUNTS FROM FCDAS-PRE-FINAL DISTRIBUTION

#### PRIVILEGED AND CONFIDENTIAL

	REMAINING		
	HOLDBACK AFTER		
	FOURTH	<u>LESS:</u>	NET
	INTERIM	AMOUNTS	PROPOSED
<u>ATTORNEY</u>	DISTRIBUTION	ASSIGNED	DISTRIBUTIONS
NY ATTORNEYS:			
SALON MARROW	\$ 42,888	\$ (9,418)	\$ 33,470
BONNER	18,448	(3,691)	14,757
FLEISCHMAN	3,141	(1,530)	1,611
TOTAL NY ATTORNEY FEES	\$ 64,477	\$ (14,640)	\$ 49,838
ROTHENBERG	\$ 47,914	\$ (10,891)	\$ 37,023
LASPADA	12,317	-	12,317
FAY	7,315	-	7,315
PERLES	7,315	-	7,315
TOTAL	\$ 74,862	\$ (10,891)	
FAY	\$ 111,824	\$ (23,520)	\$ 88,304
PERLES	111,824	(23,520)	88,304
GASKILL	5,690	(5,310)	380
KARR	1,877	- 1	1,877
HNK	28,126	(4,165)	23,962
DRENNAN	9,371	(5,310)	4,061
DONAHUE	8,589	(5,310)	3,279
TOTAL	\$ 277,302	\$ (67,134)	\$ 210,167
DAMAGES ATTORNEYS:			
BOND	\$ 1,632	\$ -	\$ 1,632
CLOWER	1,629	<u>-</u>	1,629
DRENNAN	2,242	(1,311)	930
EINHORN	1,099	(1,511)	1,099
FEENEY	2,429	_	2,429
GASKILL	2,249	_	2,249
KARR	1,476	(1,311)	165
LASPADA	3,041	(1,511)	3,041
MECIT	1,121	(1,311)	(191)
NORMAN	2,205	(1,311)	2,205
NUTA	1,829		1,829
PARSONS	657		657
PATTIN			
TOTAL DAMAGES ATTY FEES	1,627	ć (2.02.4)	1,627
TOTAL DAIVIAGES ATTY FEES	\$ 23,236	\$ (3,934)	\$ 19,303
TOTAL ATTORNEY FEES	\$ 439,878	\$ (96,599)	\$ 343,279

#### NOTES:

Amounts being assigned are for FCDAs with estate or other legal issues as of 1/27/21.

**EXHIBIT M** 

PETERSON FUND

ATTORNEY FEE DISTRIBUTION- AMOUNTS ASSIGNED

#### PRIVILEGED AND CONFIDENTIAL

		AMOU	NTS	ASSIGNED	FR	OM:		
<b>ATTORNEY</b>	3	SCDAS	PR	RE-FINAL		FINAL		<u>TOTAL</u>
NY ATTORNEYS:								
SALON MARROW	\$	5,063	\$	9,418	\$	2,582	\$	17,063
BONNER		2,337		3,691		1,012		7,040
FLEISCHMAN		-		1,530		419		1,949
TOTAL NY ATTORNEY FEES	\$	7,400	\$	14,640	\$	4,013	\$	26,053
ROTHENBERG	\$	7,381	\$	10,891	\$	2,985	\$	21,257
LASPADA		-		-		-		-
FAY		-		-		-		-
PERLES		-		-		-		-
TOTAL	\$	7,381	\$	10,891	\$	2,985	\$	21,257
FAY	\$	17,277	\$	23,520	\$	6,447	\$	47,244
PERLES	Ψ	17,277	Y	23,520	Y	6,447	Y	47,244
		17,277						
GASKILL		-		5,310		1,455		6,765
KARR		-		4.465		-		- - 200
HNK		-		4,165		1,142		5,306
DRENNAN		-		5,310		1,455		6,765
DONAHUE		-		5,310	_	1,455	_	6,765
TOTAL	\$	34,553	\$	67,134	\$	18,402	\$	120,090
DAMAGES ATTORNEYS:	\$	-	\$	-	\$	-	\$	-
BOND		-		-		-		-
CLOWER		-		-		-		-
DRENNAN		2,597		1,311		359		4,267
EINHORN		-		-		-		-
FEENEY		-		-		-		-
GASKILL		-		-		-		-
KARR		-		1,311		359		1,671
LASPADA		-		-		-		-
MECIT		_		1,311		359		1,671
NORMAN		_		-		-		· -
NUTA		_		_		-		_
PARSONS		-		-		-		-
PATTIN		-		-		-		-
TOTAL DAMAGES ATTY FEES	\$	2,597	\$	3,934	\$	1,078	\$	7,609
TOTAL ATTORNEY FEES	\$	51,931	\$	96,599	\$	26,479	\$	175,009

## **NOTES:**

Amounts being assigned are for FCDAs with estate or other legal issues as of 1/27/21.

# PETERSON CALCULATION OF ATTORNEY FEES FROM SCDAs THAT ARE BEING ASSIGNED

# PRIVILEGED AND CONFIDENTIAL

		ATTORNEY	SALON MARROW	BONNER	FLEISCHMAN	DAMAGES	DAMAGES	REFERRAL	REFERRAL	PLAINTIFF					
Epiq TN Name	Case	FEE	<u>FEE</u>	<u>FEE</u>	<u>FEE</u>	ATTY FEE	<b>ATTORNEY</b>	ATTY FEE	<b>ATTORNEY</b>	<b>ATTORNEYS</b>	<u>F&amp;P</u>	<u>HNK</u>	<b>GASKILL</b>	DRENNAN	DONAHUE
424	Peterson	\$28,850.65	\$ 2,812.94	\$ 1,298.28	\$ -	\$ 2,596.56	Drennan	\$ 7,380.96	ROTHENBERG	\$ 14,761.91	\$ 14,761.91	\$ -	\$ -	\$ -	\$ -
925	Davis	\$14,425.32	\$ 1,406.47	\$ 649.14	\$ -			\$ -	\$ -	\$ 12,369.71	\$ 12,369.71	\$ -	\$ -	\$ -	\$ -
1397	Worley	\$8,655.19	\$ 843.88	\$ 389.48	\$ -			\$ -	\$ -	\$ 7,421.83	\$ 7,421.83	\$ -	\$ -	\$ -	\$ -
TOTAL		\$ 51,931.16	\$ 5,063.29	\$ 2,336.90	\$ -	\$ 2,596.56	_	\$ 7,380.96	_	\$ 34,553.46	\$ 34,553.46	\$ -	\$ -	\$ -	\$ -

PETERSON
CALCULATION OF ATTORNEY FEES FROM PRE-FINAL DISTRIBUTIONS THAT ARE BEING ASSIGNED

PRIVILEGED AND CONFIDENTIAL										NET TO					
		PRE-FINAL ATTY	SALON MARROW	BONNER	FLEISCHMAN	DAMAGES	DAMAGES	REFERRAL	REFERRAL	PLAINTIFF					
Epiq TN Name	Case	FEE ASSIGNED	<u>FEE</u>	<u>FEE</u>	<u>FEE</u>	ATTY FEE	<b>ATTORNEY</b>	ATTY FEE	<u>ATTORNEY</u>	<b>ATTORNEYS</b>	<u>F&amp;P</u>	<u>HNK</u>	<b>GASKILL</b>	<u>DRENNAN</u>	DONAHUE
343	Peterson	\$7,284.98	\$ 710.29	\$ 327.82		\$ 655.65	Mecit	\$ 1,863.74	ROTHENBER	\$ 3,727.48	\$ 3,727.48				
424	Peterson	\$14,569.97	\$ 1,420.57	\$ 655.65		\$ 1,311.30	Drennan	\$ 3,727.48	ROTHENBER	\$ 7,454.97	\$ 7,454.97				
592	Peterson	\$7,284.98	\$ 710.29	\$ 327.82		\$ 655.65	Mecit	\$ 1,863.74	ROTHENBER	\$ 3,727.48	\$ 3,727.48				
839	Valore	\$14,569.97	\$ 1,420.57		\$ 1,529.85	\$ 1,311.30	Karr	\$ 3,436.08	ROTHENBERG	\$ 6,872.17	\$ 6,872.17				
925	Davis	\$7,284.98	\$ 710.29	\$ 327.82						\$ 6,246.87	\$ 6,246.87				
996	Davis	\$1,894.10	\$ 184.67	\$ 85.23						\$ 1,624.19	\$ 1,624.19				
1061	Davis	\$7,284.98	\$ 710.29	\$ 327.82						\$ 6,246.87	\$ 6,246.87				
1120	Taylor	\$14,569.97	\$ 1,420.57	\$ 655.65						\$ 12,493.75	\$ 3,123.44		\$3,123.44	\$3,123.44	\$3,123.44
1308	Bland	\$7,284.98	\$ 710.29	\$ 327.82						\$ 6,246.87	\$ 2,082.29	\$4,164.58			
1363	Spencer	\$10,198.98	\$ 994.40	\$ 458.95						\$ 8,745.62	\$ 2,186.41		\$2,186.41	\$2,186.41	\$2,186.41
1397	Worley	\$4,370.99	\$ 426.17	\$ 196.69						\$ 3,748.12	\$ 3,748.12				
TOTAL		\$96,598.89	\$ 9,418.39	\$ 3,691.30	\$ 1,529.85	\$ 3,933.89		\$ 10,891.05		\$ 67,134.41	\$ 47,040.30	\$4,164.58	\$5,309.84	\$5,309.84	\$5,309.84

PETERSON
CALCULATION OF ATTORNEY FEES FROM FINAL DISTRIBUTIONS THAT ARE BEING ASSIGNED

PRIVILEGED AND CONFIDENTIAL										NET TO					
		FINAL ATTY	SALON MARROW	BONNER	FLEISCHMAN	DAMAGES	DAMAGES	REFERRAL	REFERRAL	PLAINTIFF					
Epiq TN Name	Case	FEE ASSIGNED	<u>FEE</u>	<u>FEE</u>	<u>FEE</u>	ATTY FEE	<b>ATTORNEY</b>	<b>ATTY FEE</b>	<b>ATTORNEY</b>	<b>ATTORNEYS</b>	<u>F&amp;P</u>	<u>HNK</u>	<b>GASKILL</b>	<u>DRENNAN</u>	DONAHUE
343	Peterson	\$1,996.89	\$ 194.70	\$ 89.86		\$ 179.72	Mecit	\$ 510.87	ROTHENBER	\$ 1,021.74	\$ 1,021.74				
424	Peterson	\$3,993.78	\$ 389.39	\$ 179.72		\$ 359.44	Drennan	\$ 1,021.74	ROTHENBERG	\$ 2,043.48	\$ 2,043.48				
592	Peterson	\$1,996.89	\$ 194.70	\$ 89.86		\$ 179.72	Mecit	\$ 510.87	ROTHENBERG	\$ 1,021.74	\$ 1,021.74				
839	Valore	\$3,993.78	\$ 389.39		\$ 419.35	\$ 359.44	Karr	\$ 941.87	ROTHENBERG	\$ 1,883.73	\$ 1,883.73				
925	Davis	\$1,996.89	\$ 194.70	\$ 89.86						\$ 1,712.33	\$ 1,712.33				
996	Davis	\$519.19	\$ 50.62	\$ 23.36						\$ 445.21	\$ 445.21				
1061	Davis	\$1,996.89	\$ 194.70	\$ 89.86						\$ 1,712.33	\$ 1,712.33				
1120	Taylor	\$3,993.78	\$ 389.39	\$ 179.72						\$ 3,424.66	\$ 856.17		\$ 856.17	\$ 856.17	\$ 856.17
1308	Bland	\$1,996.89	\$ 194.70	\$ 89.86						\$ 1,712.33	\$ 570.78	\$1,141.55			
1363	Spencer	\$2,795.64	\$ 272.58	\$ 125.80						\$ 2,397.26	\$ 599.32		\$ 599.32	\$ 599.32	\$ 599.32
1397	Worley	\$1,198.13	\$ 116.82	\$ 53.92						\$ 1,027.40	\$ 1,027.40				
					-				'						
TOTAL		\$26,478.74	\$ 2,581.68	\$ 1,011.82	\$ 419.35	\$ 1,078.32		\$ 2,985.35		\$ 18,402.22	\$ 12,894.22	\$1,141.55	\$1,455.48	\$1,455.48	\$1,455.48

# **ATTACHMENT 2**

**EXHIBIT Q** 

PETERSON FUND AMOUNTS ASSIGNED

DRAFT FOR DISCUSSION PURPOSES ONLY

PRIVILEGED & CONFIDENTIA	AL 								TN NU	MBER									
TN:	316	343	359	362	424	<u>592</u>	<u>763</u>	839	925	996	1061	1107	1120	1308 <sup>3</sup>	1363	1397	1693	1728	TOTAL
LEAD ATTORNEY1:	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	PMD	JPD	FLF	PMD	FLF	FLF	FLF	
	1	1				l			1			1				l	· <del>-</del>		
SCDA AMOUNTS:																			
Plaintiff amounts:																			
Plaintiff portion assigned									\$ 29,731.94										\$ 29,731.94
Attorney fee portion:																			
DRENNAN					\$ 2,596.56				\$ -							\$ -			\$ 2,596.56
SALON MARROW					2,812.94				1,406.47							843.88			5,063.29
BONNER <sup>2</sup>					1,298.28				649.14							389.48			2,336.90
FAY					7,380.96				6,184.86							3,710.91			17,276.73
PERLES					7,380.96				6,184.86							3,710.91			17,276.73
ROTHENBERG					7,380.96				-							-			7,380.96
Total attorney fee portion	\$ -	\$ -	\$ -	\$ -	\$28,850.65	\$ -	\$ -	\$ -	\$ 14,425.32	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,655.19	\$ -	\$ -	\$ 51,931.16
TOTAL SCDAS	\$ -	\$ -	\$ -	\$ -	\$28,850.65	\$ -	\$ -	\$ -	\$ 44,157.26	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,655.19	\$ -	\$ -	\$ 81,663.10
PRE-FINAL AMOUNTS:																			
-1																			
Plaintiff amounts:			A 0.400 E0	A 00 466 0F		4 0001.00	4 0 004 40	4	4 00 455 00	4 = ===================================	4 00 466 00	4 0001 =0		4 00 100 00			4 0.055.80	4 224222	4.000.00
Plaintiff portion assigned			\$ 8,180.50	\$ 22,166.25		\$ 8,264.52	\$ 3,931.49	\$ 44,332.50	\$ 22,166.25	\$ 5,763.23	\$ 22,166.25	\$ 8,264.52		\$ 22,166.25			\$ 8,866.50	\$ 2,049.02	\$178,317.27
RD Legal amount assigned						42.004.72							44,332.50	1	1	1		1	44,332.50
Specialty amount assigned						13,901.73								l	l			l	13,901.73
A																			
Attorney fee portion: DRENNAN					\$ 1,311.30														\$ 1,311.30
KARR					\$ 1,311.30			1,311.30						l	l .			l	1,311.30
MECIT		655.65				655.65		1,311.30								l I			1,311.30
SALON MARROW		710.29			1,420.57	710.29		1,420.57	710.29	184.67	710.29		1,420.57	710.29	994.40	426.17		l I	9,418.39
BONNER <sup>2</sup>		327.82			655.65	327.82		1,120.57	327.82	85.23	327.82		655.65	327.82	458.95	196.69		l I	3,691.30
FLEISCHMAN		327.82			033.03	327.62		1,529.85	327.62	03.23	327.82		033.03	327.82	436.53	190.09		l I	1,529.85
FAY		1,863.74			3,727.48	1,863.74		3,436.09	3,123.44	812.09	3,123.44		1,561.72	1,041.15	1,093.20	1,874.06		l	23,520.15
PERLES		1,863.74			3,727.48	1,863.74		3,436.09	3,123.44	812.09	3,123.44		1,561.72	1,041.15	1,093.20	1,874.06		l	23,520.15
GASKILL		1,003.74			3,727.40	1,003.74		-	3,123.44	012.03	3,123.44		3,123.44	1,041.15	2,186.41	1,074.00		l I	5,309.84
HNK						l I							3,123.44	4,164.58	2,100.41	l I		l I	4,164.58
DRENNAN		1			l			-	l			i	3,123.44	,,	2,186.41			l	5,309.84
DONAHUE		1			l			-	l			i	3,123.44	l	2,186.41			l	5,309.84
ROTHENBERG		1,863.74			3,727.48	1,863.74		3,436.08					0,220111	l	_,			l	10,891.05
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			,	,		-,											
Total attorney fee portion		7,284.98	-	-	14,569.97	7,284.98	-	14,569.97	7,284.98	1,894.10	7,284.98	-	14,569.97	7,284.98	10,198.98	4,370.99	-	-	96,598.89
TOTAL PRE-FINAL		7,284.98	8,180.50	22,166.25	14,569.97	29,451.23	3,931.49	58,902.47	29,451.23	7,657.32	29,451.23	8,264.52	58,902.47	29,451.23	10,198.98	4,370.99	8,866.50	2,049.02	333,150.39
FINAL AMOUNTS:																			
Plaintiff amounts:																			
Plaintiff portion assigned	\$ 2,740.13		\$ 1,473.91	\$ 3,993.78		\$ 3,993.78	\$ 708.35	\$ 7,987.55	\$ 3,993.78	\$ 1,038.38	\$ 3,993.78	\$ 3,993.78		\$ 3,993.78			\$ 1,597.51	\$ 369.18	\$ 39,877.68
RD Legal amount assigned													7,987.55						7,987.55
		1			1							1							

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TN:	<u>316</u>	<u>343</u>	<u>359</u>	<u>362</u>	<u>424</u>	<u>592</u>	<u>763</u>	<u>839</u>	<u>925</u>	<u>996</u>	<u>1061</u>	1107	<u>1120</u>	1308 <sup>3</sup>	<u>1363</u>	<u>1397</u>	<u>1693</u>	1728	<u>TOTAL</u>
LEAD ATTORNEY1:	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	FLF	PMD	JPD	FLF	PMD	FLF	FLF	FLF	
Attorney fee portion:																			
DRENNAN					\$ 359.44														\$ 359.44
KARR								359.44											359.44
MECIT		179.72				179.72													359.44
SALON MARROW		194.70			389.39	194.70		389.39	194.70	50.62	194.70		389.39	194.70	272.58	116.82			2,581.68
BONNER <sup>2</sup>		89.86			179.72	89.86			89.86	23.36	89.86		179.72	89.86	125.80	53.92			1,011.82
FLEISCHMAN								419.35											419.35
FAY		510.87			1,021.74	510.87		941.87	856.17	222.60	856.17		428.08	285.39	299.66	513.70			6,447.12
PERLES		510.87			1,021.74	510.87		941.87	856.17	222.60	856.17		428.08	285.39	299.66	513.70			6,447.12
GASKILL								-					856.17		599.32				1,455.48
HNK														1,141.55					1,141.55
DRENNAN								-					856.17		599.32				1,455.48
DONAHUE								-					856.17		599.32				1,455.48
ROTHENBERG		510.87			1,021.74	510.87		941.87											2,985.35
Total attorney fee portion	\$ -	\$ 1,996.89	\$ -	\$ -	\$ 3,993.77	\$ 1,996.89	\$ -	\$ 3,993.78	\$ 1,996.90	\$ 519.18	\$ 1,996.90	\$ -	\$ 3,993.77	\$ 1,996.89	\$ 2,795.65	\$ 1,198.13	\$ -	\$ -	\$ 26,478.74
TOTAL FINAL	\$ 2,740.13	\$ 1,996.89	\$ 1,473.91	\$ 3,993.78	\$ 3,993.77	\$ 5,990.66	\$ 708.35	\$11,981.33	\$ 5,990.67	\$1,557.57	\$ 5,990.67	\$ 3,993.78	\$11,981.32	\$ 5,990.67	\$ 2,795.65	\$ 1,198.13	\$ 1,597.51	\$ 369.18	\$ 74,343.98
TOTAL ALL	\$ 2,740.13	\$ 9,281.87	\$ 9,654.41	\$26,160.03	\$47,414.39	\$35,441.90	\$4,639.84	\$70,883.80	\$ 79,599.17	\$9,214.89	\$35,441.91	\$12,258.30	\$70,883.79	\$35,441.90	\$12,994.63	\$14,224.32	\$10,464.01	\$ 2,418.20	\$489,157.47
TOTAL PLAINTIFF AMOUNT	\$ 2,740.13	\$ -	\$ 9,654.41	\$26,160.03	\$ -	\$12,258.30	\$4,639.84	\$52,320.05	\$ 55,891.97	\$6,801.61	\$26,160.03	\$12,258.30	\$ -	\$26,160.03	\$ -	\$ -	\$10,464.01	\$ 2,418.20	\$247,926.89
TOTAL RD LEGAL	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$52,320.05	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 52,320.05
TOTAL SPECIALTY	\$ -	\$ -	\$ -	\$ -	\$ -	\$13,901.73	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,901.73
TOTAL ATTORNEY FEES	\$ -	\$ 9,281.87	\$ -	\$ -	\$47,414.39	\$ 9,281.87	\$ -	\$18,563.75	\$ 23,707.20	\$2,413.28	\$ 9,281.88	\$ -	\$18,563.74	\$ 9,281.88	\$12,994.63	\$14,224.32	\$ -	\$ -	\$175,008.80
<sup>1</sup> Lead attorney abbreviation:	s: FLF-Fay Law	Firm, PMD- P	atrick M. Don	ahue, HNK-No	el Nudelman,	JPD- Joseph P.	. Drennan												
<sup>2</sup> Bonner fees should be paid	•			•															
<sup>3</sup> TN 1308 is being assigned to					•	•		1											
114 1300 is being assigned to	oray Law Filli	i at the reques	st and consen	t or rieldernar	i ivuueillali X	Nailk, i'C allu i	ay Law Filli				l	l	l	l	l	l	l	I	

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TN	Plaintiff	Estate Representative	Lead Litigation Attorney	Principal Defects
316		i e e e e e e e e e e e e e e e e e e e	Fay Law Group	Conflicting payment instructions
343			Fay Law Group	Estate issue-awaiting distribution order
359			Fay Law Group	FCDA not returned
362			Fay Law Group	FCDA incomplete
424			Fay Law Group	Estate issue-awaiting distribution order
592			Fay Law Group	Missing estate info; FCDA not returned
763			Fay Law Group	Conflicting payment instructions
839			Fay Law Group	Missing estate info
925			Fay Law Group	Missing estate info; SCDA incomplete; FCDA not returned
996			Fay Law Group	FCDA not returned; missing estate info
1061			Fay Law Group	FCDA not returned
1107			Patrick M. Donahue	FCDA not returned
1120			Joseph P. Drennan	Estate not opened; FCDA not returned
1308			Fay Law Group	FCDA incomplete; missing estate info
1363			Patrick M. Donahue	Estate issue-awaiting distribution order
1397			Fay Law Group	Estate issue-awaiting distribution order
1693			Fay Law Group	FCDA not returned
1728			Fay Law Group	FCDA not returned